

1359.27

POLREP 661

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING SATURDAY 08/08/92.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH SITE SPECIFIC CONTRACT FOR DRUMS.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (8/7/92) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	191,806	195,000
EPA INDIRECT.....	332,559	340,000
TAT	2,011,244	2,050,000
ERCS(OHM) ..(04/07/92) ..	7,494,499	7,685,000
USCG(10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS..	10,227,623	10,467,515

F. REMEDIAL COSTS TO (8/7/92)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM) ... (4/28/92)	3,141,564*	3,180,000
ERCS(EHRT) .. (1/22/92)	2,624,582*	2,728,840
SITE SPEC. CONTRACT..	---	2,500,000
TOTAL REMEDIAL COSTS..	6,701,338	9,398,840
G. TOTAL PROJECT COSTS..	16,921,773	19,866,355
H. TOTAL UNALLOCATED FUNDS.....		889,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

AR104317

L. ENFORCEMENT (106) COSTS 02/05/92 - 08/7/92

EPA.....	6,869
TAT.....	106,263

M. TOTAL ENFORCEMENT = \$244,281

N. PERSONNEL ON-SCENE	EPA.....00
	ARCS.....01
	TAT.....03

O. WEATHER: MOSTLY SUNNY, LOW TO HIGH 90'S

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, OSC DAW, RPM GROSS AND ORC WALERS CONTINUED COORDINATION OF REMOVAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. TAT CONTINUED ENFORCEMENT OVERSIGHT OF THIRD PARTY (REPETTO) ACTIVITIES AND MONITORING OF WWTP ACTIVITIES. TAT CONTINUED WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE PENDING AWARD OF SITE SPECIFIC CONTRACT, AND COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT CONTINUES. TAT CONDUCTED OVERSIGHT OF REPETTO CREW COLLECTING WATER SAMPLES AT MANHOLE #3 07/28/92. TAT INSPECTED THE ON-SITE LEAKING TRANSFORMERS WITH PELLISSIER(FMC), PLAUGER(ERM), JUDD(AVTEX), AND KOEHLER(ARCS) 07/31/92 AND 08/07/92.

C. FMC/ERM RESUMED DISCHARGING TREATED WATER TO THE SHENANDOAH RIVER 07/23/92. WATER LEVEL OF BASIN #1 WAS ABOVE 2' FREEBOARD LIMIT (1'10") AS READ 8/3/92 DUE TO ONE AFTERNOON HEAVY RAIN. ALL OTHER BASINS WATER LEVEL REMAINED BELOW THE 2' FREEBOARD LIMIT.

D. THIRD PARTY (REPETTO) ACTIVITIES REMAIN SUSPENDED PENDING SUBMISSION OF ANALYTICAL RESULTS (FOR ELECTRICAL CABLE WORKPLAN) AND OTHER WORKPLANS BY REPETTO TO EPA FOR REVIEW AND APPROVAL PER TERMS AND CONDITIONS OF THE ADMINISTRATIVE ORDER. REPETTO COMPLETED WATER SAMPLING AT MANHOLE #3 07/28/92 FOR PCB, VOLATILE, SEMI-VOLATILE, TSS, pH, PRIORITY POLLUTANT METALS, OIL AND GREASE, COD, ARSENIC, AND ZINC. REPETTO CREW INTENDED TO REMOVE CABLES ABOVE GROUND FROM THE WALL IN SPINNING ROOM, NEAR THE MANHOLE #3, WHICH WERE NOT MENTIONED IN HIS WORK PLAN, 07/29/92. THE WORK WAS SUSPENDED AND OSC ZENONE WAS CONTACTED BY TAT. OSC ZENONE CONFIRMED THAT JAR WAS NOT TO PERFORM ANY WORK NOT AUTHORIZED IN THE WORKPLAN. JAR REMOVED EQUIPMENT FROM SPINNING ROOM AND LEFT SITE.

AR104318

E. ONE SECURITY GUARD REPORTED SMELLING A STRONG SULFUR LIKE ODOR AT 22:00 08/05/92 WHILE PATROLLING IN THE VICINITY OF THE NCA 4 ACCESS WAY. THE INSTRUMENT READ 15 PPM OF HYDROGEN SULFIDE IN THE DISCRETE POCKETS ALONG THE ROAD.

III. FUTURE PLANS

A. SITE SPECIFIC CONTRACT FOR T&D OF DRUMS IS PENDING.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A DAILY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.661

AR104319

POLREP 662

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING SATURDAY 08/22/92.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH SITE SPECIFIC CONTRACT FOR DRUMS.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (8/22/92) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	192,211	195,000
EPA INDIRECT.....	333,288	340,000
TAT	2,014,287	2,050,000
ERCS(OHM)....(04/07/92) ..	7,494,499	7,685,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,231,800	10,467,515

F. REMEDIAL COSTS TO (8/22/92)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM)....(4/28/92) ..	3,141,564*	3,180,000
ERCS(EHRT)....(1/22/92) ..	2,624,582*	2,728,840
SITE SPEC. CONTRACT..	---	2,500,000
TOTAL REMEDIAL COSTS..	6,701,338	9,398,840
G. TOTAL PROJECT COSTS..	16,921,773	19,866,355
H. TOTAL UNALLOCATED FUNDS.....		889,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135

TBD

AR104320

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 08/22/92

EPA.....	7,388
TAT.....	119,849

M. TOTAL ENFORCEMENT = \$258,386

N. PERSONNEL ON-SCENE	EPA.....01
	ARCS.....01
	TAT.....02

O. WEATHER: CLOUDY/RAIN ABOUT ONE WEEK AND PARTLY SUNNY FOR THE REST OF THE TIME, 70'S TO LOW 90'S

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, OSC DAW, RPM GROSS AND ORC WALERS CONTINUED COORDINATION OF REMOVAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS). 8/10/92 OSC ZENONE HAD AN ON-SITE MEETING WITH J. REPETTO (JAR). TAT AND ARCS ATTENDED THE MEETING. OSC APPROVED ONE WORK PLAN SUBMITTED BY REPETTO FOR REMOVAL OF TWO TURBODYNE 1600 HORSEPOWER STEAM TURBINES (DOCKET NO. III-92-30-DC). TWO OTHER WORK PLANS HAD BEEN REVIEWED, AND DEFICIENCIES PROVIDED IN WRITING TO REPETTO. THE TWO WORK PLANS WERE: THE WORK PLAN (SUBMITTED JULY 20, 1992) FOR ONE GENERAL ELECTRIC 3500KW STEAM TURBINE WITH SWITCHGEAR, AND THE ADDENDUM #1 (AUGUST 3, 1992) OF THE REVISED (JULY 13, 1992) WORK PLAN FOR REMOVING ELECTRICAL CABLES. ON 08/11/92 OSC INSPECTED STAGED DRUM CONDITIONS WITH TAT AND ARCS AND TASKED TAT TO SUBMIT A LIST OF RAIN WATER AFFECTED DRUMS AND THEIR LOCATIONS. ON 8/14/92 REPETTO REQUESTED AN AMENDMENT TO THE ADMINISTRATIVE ORDER FOR 30-DAY EXTENSION TO SUBMIT WORK PLANS. ON 8/18/92 OSC DISCUSSED REPETTO'S REQUEST WITH REGIONAL MANAGEMENT. OSC ADVISED REPETTO THAT EPA WAS CONSIDERING THE REQUEST AND INFORMED REPETTO THAT HE SHOULD BE PREPARED TO SUBMIT THE WORK PLANS ON OR BEFORE 9/16/92 PENDING AMENDMENT OF THE ORDER. ON 08/21/92 OSC CONDITIONALLY APPROVED REPETTO'S WORK PLAN FOR REMOVING ELECTRIC CABLES. VIA TELECON OSC TASKED TAT TO REVIEW THE WORK SCHEDULE SUBMITTED BY REPETTO AND INITIALIZE ALL THE CHANGES AND COMMENTS.

AR104321

B. TAT CONTINUED ENFORCEMENT OVERSIGHT OF THIRD PARTY (REPETTO) ACTIVITIES AND MONITORING OF WWTP ACTIVITIES. TAT CONTINUED WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE PENDING AWARD OF SITE SPECIFIC CONTRACT, AND COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT CONTINUES. TAT ATTENDED OSC AND JAR MEETING ON 08/10/92. TAT CONDUCTED OVERSIGHT OF REPETTO CREWS' ACTIVITY ON REMOVING STEAM TURBINES OFFSITE 08/12/92. TAT ESCORTED AN IDA GROUP FROM FRONT ROYAL VISITING WWTP PUMP HOUSE AND THE FILTER HOUSE ON SITE 08/16/92. TAT INSPECTED ALL THE STAGED DRUMS FOR RAIN WATER EFFECTS ON 08/10, 12, 19 & 21/92. AN INSPECTION REPORT WAS SUBMITTED 8/21/92. TASKED BY OSC, 08/21/92 TAT REVIEWED AND DRAFTED TECHNICAL RECOMMENDATIONS ON REPETTO'S WORK SCHEDULE SUBMITTED FOR ELECTRICAL CABLE REMOVAL. OSC INFORMED REPETTO THAT NO WORK WOULD BE CONDUCTED UNLESS TECHNICAL RECOMMENDATIONS WERE INCORPORATED INTO THE WORK SCHEDULE.

C. FMC/ERM CONTINUED DISCHARGING TREATED WATER TO THE SHENANDOAH RIVER. ON 08/11/92 WWTP WAS TEMPORARILY SHUT DOWN FOR 7 HOURS DUE TO SHORT OF HCL SUPPLY. WATER LEVELS OF ALL THE BASINS REMAINED BELOW THE 2' FREEBOARD LIMIT.

D. REPETTO CREW WORKED ON REMOVAL OF TWO STEAM TURBINES LOCATED NEAR BAGHOUSE ON 08/12/92. TAT NOTICED THAT REPETTO WAS WORKING WITHOUT STEELTOE SHOES. DURING THE LOADING PROCESS OIL WAS LEAKING FROM ONE HYDRO RESERVOIRS & FILTER SYSTEM UNIT. REPETTO USED DUCT TAPE TO SEAL THE FLANGE. HOWEVER, OIL WAS STILL DRIPPING FROM THE FLANGE AND FROM TWO OPEN TUBE HOLES AT THE OTHER SIDE OF THE UNIT. NO FURTHER CLEAN-UP ACTION WAS OBSERVED TO BE TAKEN BY REPETTO. THE TURBINES WERE TRANSPORT OFFSITE BY 1800PM, 8/12/92. ON 08/14/92 REPETTO HANDED IN THE ANALYTICAL RESULTS OF THE WATER SAMPLES TAKEN 7/28/92 AT MANHOLE #3. THE RESULT SHOWED PCB LEVEL BELOW 1 PPB. REPETTO APPROACHED TAT FOR A COPY OF OHM'S WORK PLAN ON THE DEMOLITION OF ACID RECLAIM ON 08/19/92. TAT INFORMED REPETTO THAT A WRITTEN REQUEST TO OSC OR RPM FOR APPROVAL WAS NEEDED BEFORE ANY DOCUMENTATION COULD BE RELEASED. REPETTO SUBMITTED A WORK SCHEDULE FOR THE CONDITIONALLY APPROVED WORK PLAN ON REMOVAL OF ELECTRICAL CABLES ON 08/21/92.

E. A MEETING WAS HELD ON SITE 13:00PM, 8/20/92 REGARDING LIGHTS FOUND ON INSIDE ROOM #10 STAPLES. A GROUP FROM IDA, FRONT ROYAL, VISITED PUMP HOUSE AND FILTER HOUSE ON SITE 08/18/92.

AR104322

III. FUTURE PLANS

A. SITE SPECIFIC CONTRACT FOR T&D OF DRUMS IS PENDING.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A DAILY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

**VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.662**

AR104323

POLREP 663

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING SATURDAY 09/05/92.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH SITE SPECIFIC CONTRACT FOR DRUMS.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (9/05/92) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	192,271	195,000
EPA INDIRECT.....	333,396	340,000
TAT	2,016,348	2,050,000
ERCS(OHM) .. (04/07/92) ..	7,494,499	7,685,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,234,029	10,467,515

F. REMEDIAL COSTS TO (9/05/92)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM) ... (4/28/92) ..	3,141,564*	3,180,000
ERCS(EHRT) .. (1/22/92) ..	2,624,582*	2,728,840
SITE SPEC. CONTRACT..	---	2,500,000
TOTAL REMEDIAL COSTS..	6,701,438	9,398,840
G. TOTAL PROJECT COSTS..	16,935,467	19,866,353
H. TOTAL UNALLOCATED FUNDS.....		889,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

AR104324

L. ENFORCEMENT (106) COSTS 02/05/92 - 09/05/92

EPA.....	8,852
TAT.....	140,532

M. TOTAL ENFORCEMENT = \$280,533

N. PERSONNEL ON-SCENE	EPA.....01
	ARCS.....01
	TAT.....02

O. WEATHER: MOSTLY SUNNY, LOW 80'S TO MID 90'S

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, OSC DAW, RPM GROSS AND ORC WALERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS). OSC ZENONE ON SITE 8/28 - 9/1/92.

8/28, 8/29, 8/30 OSC CONTINUED REVIEW OF WORK PLANS SUBMITTED BY REPETTO. THIS REVIEW WAS DONE IN CONJUNCTION WITH INSPECTION OF ASSETS AND LOCATIONS.

MEETING HELD 8/31 WITH OSC ZENONE; ARCS KOEHLER; TATS WHITLOCK AND DAVE; AVTEX MINDY SCHRYVER AND JERRY JUDD; AND THIRD PARTY REPETTO (JAR).

SCHRYVER ASKED ZENONE ABOUT THE STATUS OF THE UNOPENED DRUMS WORK PLAN SUBMITTED BY AVTEX. ZENONE INDICATED THAT ALL WORK PLANS MUST BE IN CONFORMANCE WITH TERMS AND CONDITIONS OF THE ORDER. EPA HAD PREVIOUSLY PROVIDED SOME COMMENTS BACK TO AVTEX CONCERNING THIS WORK PLAN. ZENONE GRANTED AN EXTENSION TO JAR TO REMOVE ELECTRICAL CABLE BY 9/4/92. ZENONE PROVIDED WRITTEN DEFICIENCIES TO JAR CONCERNING WORK PLANS FOR "ACID BATH EQUIPMENT" AND "CLEAN ASSETS REMOVAL".

MEETING HELD 9/1 WITH OSC ZENONE, CAM ZARROLI - Z&A, JOE REPETTO, ARCS KOEHLER, AND TATS WHITLOCK AND DAVE.

ZARROLI EXPRESSED HIS CONCERNS ABOUT DEFICIENCIES. ZENONE EXPLAINED THAT ASSETS CANNOT BE GROUPED TOGETHER UNDER ONE WORK PLAN SINCE THESE ASSETS MAY BE LOCATED IN TOTALLY DIFFERENT AREAS OF THE PLANT WHICH RAISES COMPLETELY DIFFERENT HEALTH & SAFETY, DECONTAMINATION, ACCESS AND REMOVAL ISSUES.

B. TAT CONTINUED ENFORCEMENT OVERSIGHT OF THIRD PARTY (REPETTO) ACTIVITIES AND MONITORING OF WWTP ACTIVITIES. TAT CONTINUED WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE PENDING AWARD OF SITE SPECIFIC CONTRACT. COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT CONTINUES. TAT ATTENDED MEETINGS ON 08/31/92 AND 9/1/92. TAT CONDUCTED OVERSIGHT OF REPETTO CREW REMOVING COPPER ELECTRICAL

AR104325

CABLE DURING WEEKS ENDING 8/29 AND 9/5/92. TAT REVIEWED WORK PLAN SUBMITTED BY REPETTO DATED 8/10/92 COVERING VISCOSE MANUFACTURING AREA ASSETS.

C. FMC/ERM CONTINUED DISCHARGING TREATED WATER TO THE SHENANDOAH RIVER. WATER LEVELS OF ALL THE BASINS REMAINED BELOW THE 2' FREEBOARD LIMIT.

D. REPETTO CREW WORKED ON REMOVAL OF ELECTRICAL CABLE WEEKS ENDING 8/29 AND 9/5/92. WATER THAT WAS STORED IN TANKS NEAR MANHOLE #2 WAS PUMPED INTO SEWER SYSTEM AFTER ANALYTICAL RESULTS SHOWED IT TO BE FREE OF CONTAMINANTS. OTHER ACCUMULATED WATER IN MANHOLES WAS LIKEWISE PUMPED TO TANKS AND THEN TO SEWER SYSTEM. "LIVE" CABLES WERE MARKED AS SUCH AND "DEAD" CABLES WERE CUT AND PULLED.

WEEK ENDING 8/29 - WATER WAS PUMPED FROM MANHOLES #1A, #2, AND #3 INTO SEWER SYSTEM. ELECTRICIAN WAS ON SITE TO TEST CABLES AND MARK THE ONES WHICH WERE LIVE. REPETTO CREW CUT CABLES IN MANHOLES #1, #1A, #2, AND #3. CREW ALSO CUT CABLES IN SPINNING BUILDING LOOSE FROM CABLE TRAYS. 3 250' CABLES WERE PULLED FROM THE TRAYS. 7 CABLES PULLED FROM IN BETWEEN MANHOLES #1 AND #1A. 7 CABLES PULLED FROM IN BETWEEN MANHOLES #1A AND #2. 7 CABLES PULLED FROM IN BETWEEN MANHOLES #2 AND #3.

WEEK ENDING 9/5 - 7 250' CABLES PULLED FROM BETWEEN MANHOLES #2 AND #3 WERE SPOOLED AND SHIPPED OFF SITE. 4 SHORT SECTIONS OF CABLE WERE PULLED FROM MANHOLE #1 BACK TO SUBSTATION USING FORK TRUCK, AFTER THEY HAD BEEN CUT ON BOTH ENDS. A FIFTH SECTION OF CABLE WAS ATTEMPTED TO BE PULLED BUT FAILED UNSUCCESSFULLY. 3 SHORT SECTIONS OF CABLE WERE PULLED FROM MANHOLE #3 UP TO TRANSFORMERS INSIDE BUILDING USING BOBCAT. 4 OTHER SECTIONS WERE ATTEMPTED TO BE PULLED BUT FAILED UNSUCCESSFULLY AFTER SSO JERRY JUDD DEEMED THE WORK TOO DANGEROUS. THE CREW HAD VERY LIMITED LIGHTING, ATTEMPTED INITIALLY TO USE AN ALUMINUM LADDER (CONDUCTOR OF ELECTRICITY), AND WERE HANDLING THE LIVE CABLES MUCH TOO OFTEN. REPETTO MADE THE DECISION TO TAKE WHAT THEY HAD PULLED AND LEAVE THE REST.

AR104326

III. FUTURE PLANS

A. SITE SPECIFIC CONTRACT FOR T&D OF DRUMS IS PENDING.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A DAILY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. OSC TO CONDUCT BRIEFING AND SITE TOUR FOR VADWM OFFICIALS ON 9/29/92.

E. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

**VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.663**

AR104327

POLREP 664

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING SATURDAY 09/19/92.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH SITE SPECIFIC CONTRACT FOR DRUMS.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (9/19/92) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	192,271	195,000
EPA INDIRECT.....	333,396	340,000
TAT	2,018,833	2,050,000
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F. REMEDIAL COSTS TO (9/19/92)

	ESTIMATED:	CEILING:
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EPA INDIRECT.....	131,768	150,000
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ERCS(OHM) ... (4/28/92)	3,141,564*	3,180,000
ERCS(EHRT) .. (1/22/92)	2,624,582*	2,728,840
SITE SPEC. CONTRACT..	---	2,500,000
TOTAL REMEDIAL COSTS..	6,701,438	9,398,840
G. TOTAL PROJECT COSTS..	16,937,952	19,866,355
H. TOTAL UNALLOCATED FUNDS.....		889,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

AR104328

L. ENFORCEMENT (106) COSTS 02/05/92 - 09/19/92

EPA.....	8,852
TAT.....	156,499

M. TOTAL ENFORCEMENT = \$296,032

N. PERSONNEL ON-SCENE	EPA.....01
	ARCS.....01
	TAT.....02

O. WEATHER: MOSTLY SUNNY, LOW 70'S TO MID 80'S

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, OSC DAW, RPM GROSS AND ORC WALERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

9/14/92: OSC INFORMED VIA TELECON THAT TRUSTEE WAS IN PROCESS OF DETERMINING PLAN OF ACTION AND COSTS TO ADDRESS LEAKING PCB TRANSFORMERS.

9/16/92: DUE DATE FOR REPETTO TO SUBMIT WORK PLANS PASSED WITH NO WORK PLANS SUBMITTED.

B. TAT CONTINUED ENFORCEMENT OVERSIGHT OF THIRD PARTY (REPETTO) ACTIVITIES AND MONITORING OF WWTP ACTIVITIES. TAT CONTINUED WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE PENDING AWARD OF SITE SPECIFIC CONTRACT. COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT CONTINUES. TAT CONTINUED REVIEWING WORK PLAN SUBMITTED BY REPETTO DATED 8/10/92 COVERING VISCOSE MANUFACTURING AREA ASSETS. TAT COMPILED INFORMATION FOR OSC BRIEFING WITH VADWM SCHEDULED FOR 9/29/92.

C. FMC/ERM CONTINUED DISCHARGING TREATED WATER TO THE SHENANDOAH RIVER. WWTP WAS SHUT DOWN 9/9 - 9/10/92 DUE TO A HEALTH & SAFETY TRAINING CONDUCTED ON SITE FOR ERM EMPLOYEES. PLANT WAS RESTARTED MORNING OF 9/11/92. WATER LEVELS OF ALL THE BASINS REMAINED BELOW THE 2' FREEBOARD LIMIT.

D. REPETTO CREW NOT ON SITE SINCE COMPLETING REMOVAL OF ELECTRICAL CABLE ON 9/3/92.

AR104329

III. FUTURE PLANS

A. SITE SPECIFIC CONTRACT FOR T&D OF DRUMS IS PENDING.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A DAILY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. OSC TO CONDUCT BRIEFING AND SITE TOUR FOR VADWM OFFICIALS ON 9/29/92.

E. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

**VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.664**

AR104330

POLREP 665

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC: BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING SATURDAY 10/31/92.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH SITE SPECIFIC CONTRACT FOR DRUMS.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (10/30/92) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	192,691	195,000
EPA INDIRECT.....	334,152	340,000
TAT	2,026,597	2,050,000
ERCS(OHM)...(04/07/92)..	7,494,499	7,685,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,245,454	10,467,515

F. REMEDIAL COSTS TO (10/30/92)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM)...(4/28/92)	3,141,564*	3,180,000
ERCS(EHRT)...(1/22/92)	2,624,582*	2,728,840
SITE SPEC. CONTRACT..	---	2,500,000
TOTAL REMEDIAL COSTS..	6,701,438	9,398,840
G. TOTAL PROJECT COSTS..	16,941,591	19,866,355
H. TOTAL UNALLOCATED FUNDS.....		889,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

AR104331

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 10/31/92

EPA.....	10,146
TAT.....	196,514

M. TOTAL ENFORCEMENT = \$337,809

N. ARCS AND TAT PERSONNEL ON-SCENE ON A DAILY BASIS, EPAPERSONNEL ON-SCENE ON A PERIODIC BASIS.

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, OSC DAW, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. OSC ZENONE, OSC LAPSLEY, AND RPM PALESTINI ON SITE 9/29/92 FOR BRIEFING AND SITE TOUR WITH GROUP OF 15 REPRESENTATIVES FROM VIRGINIA DEPT. OF WASTE MGMT. OSC ZENONE REMAINED ON SITE THROUGH 10/02/92 TO COORDINATE ADDITIONAL REMOVAL AND REMEDIAL ACTIVITIES. ACCOMPANIED REPRESENTATIVES FROM BEAVER MANUFACTURING ON 9/30/92 TO INSPECT ASSETS THEY WISH TO REMOVE FROM SITE. OSC RECEIVED CORRESPONDENCE FROM JAR ON 10/12/92 ASKING ABOUT 30-DAY EXTENSION OF WORK PLAN SUBMITTAL DEADLINE OUTLINED IN ADMINISTRATIVE ORDER. OSC REITERATED TO JAR THAT EXTENSION WAS A ONE-TIME EXTENSION OF 30 DAYS WHICH EXPIRED ON 9/16/92.

C. 10/16/92: MEETING HELD IN REGIONAL OFFICES TO FACILITATE THIRD PARTY (ZARROLI & ASSOCIATES, INC.) REMOVAL OF ASSETS. ZARROLI INDICATED INTEREST TO HIRE A QUALIFIED CONTRACTOR AND ENTER INTO A CONSNET ORDER WITH EPA.

D. TAT CONTINUED ENFORCEMENT OVERSIGHT OF THIRD PARTY (REPETTO) ACTIVITIES AND MONITORING OF WWTP ACTIVITIES. TAT CONTINUED WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE PENDING AWARD OF SITE SPECIFIC CONTRACT. COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT CONTINUES. TAT ESCORTED 2 & A's POTENTIAL CONTRACTORS AND POTENTIAL CLIENTS (CHINESE AND MEXICANS) FOR ONSITE TOURS ON 10/07/92, 10/13/92 AND 10/15/92.

E. 10/19/92 TAT/ARCS REVIEWED THE PAPER WORK AND INSPECTED REPETTO'S EQUIPMENT WHICH RENTCO/EAGLE EQUIPMENT RENTAL WOULD SHIP OFFSITE, TO DETERMINE IF DECON WAS NEEDED. 10/26/92 TAT ESCORTED STATE

AR104332

SECRETARY OF ECONOMIC DEVELOPMENT CATHELEN MAGENNIS, MAYOR STANLEY BROOKS, REDEVELOPMENT COMMITTEE FREDERICK FOSTER, AND NORTHERN VIRGINIA DAILY DENNIS LYNCH FOR AN ONSITE TOUR. 10/28/92 TAT ATTENDED MEETING DISCUSSION WITH MAZZA ENGINEERING ABOUT HEALTH AND SAFETY ISSUES FOR THEIR ACTIVITIES ONSITE STARTING 11/04/92. ON 1645 PM 10/29/92 TAT RESPONDED TO A FIRE ACCIDENT REPORTED BY SECURITY GUARD AT THE LIME STORAGE SHED OF WWTP. FIRE WAS OFF WHEN TAT ARRIVED ON SCENE. NO FURTHER ACTION WAS NEEDED AT THE TIME. 10/29/92 TAT ESCORTED E & A'S POTENTIAL CONTRACTOR 7-7 INC. FOR AN ONSITE TOUR, AND 10/30/92 ESCORTED E & A'S POTENTIAL CLIENT JOHN AIDONIS TO POWER HOUSE, MACHINE SHOP, AND POLYPRO AREAS. F. REPETTO CREW WERE NOT ON SITE SINCE COMPLETING REMOVAL OF ELECTRICAL CABLE ON 9/3/92. JAR WAS ON SITE 10/3/92 TO REMOVE RESPIRATORS, PLASTIC SHEETING, DUCT TAPE, UNUSED ASBESTOS BAGS, ETC. FROM GARAGE, OFFICE, AND BONEYARD DECON TRAILER FOR USE ON ANOTHER JOB. G. REPETTO CREW WERE ON SITE 10/07/92 TO COLLECT TOOLS AT GARAGE AREA. H. REPETTO WAS ON SITE 10/22/92 TO HELP RENTCO FOR EQUIPMENT TO TRANSPORT OFFSITE. REPETTO WAS ONSITE 10/27-28/92 AT OFFICE AREA. I. FMC/ERM CONTINUED DISCHARGING TREATED WATER TO THE SHENANDOAH RIVER. WWTP WAS SHUT DOWN 9/29/92 FOR CLEANING OF FINAL CLARIFIER. WWTP WAS RESTARTED MORNING OF 9/30/92. ERM IN PROCESS OF INSULATING ALL EXPOSED PIPING AS PART OF WINTERIZATION PLAN. WATER LEVELS OF ALL THE BASINS REMAINED BELOW THE 2' FREEBOARD LIMIT. J. A FIRE ACCIDENT DUE TO THE MALFUNCTION OF THE IGNITION INTERLOCK IN THE BOILER ROOM OF WWTP WAS REPORTED ON 1645PM OF 10/29/92. FIRE WAS EXTINGUISHED AFTER THE PUMP WAS TURNED OFF. NO INJURIES OR DAMAGE AS A RESULT OF THE INCIDENT OCCURRED.

AR104333

III. FUTURE PLANS

- A. OSC CONTINUE TO COORDINATE TEP CONSENSUS REPORT WITH REGIONAL CONTRACTS FOR THE TED OF DRUMS.
- B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A DAILY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT.
- C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.
- D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.665

Distribution:

TO: HARRY DAW	(DAW.HARRY)
TO: DEBBIE DIETRICH	(DIETRICH.DEBBIE)
TO: OPA /REG.III	(OPA/REG.III)
TO: ORC REG.III	(ORC/REG.III)
TO: RRC OFFICE	(RRC)
TO: VINCENT ZENONE	(ZENONE.VINCENT)

AR104334

POLREP 666

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: MONTH ENDING MONDAY 11/30/92.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH SITE SPECIFIC CONTRACT FOR DRUMS.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (11/30/92) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	192,691	195,000
EPA INDIRECT.....	334,152	340,000
TAT	2,030,180	2,050,000
ERCS(OHM) .. (04/07/92) ..	7,494,499	7,685,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,249,037	10,467,515

F. REMEDIAL COSTS TO (11/30/92)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM) ... (4/28/92)	3,141,564*	3,180,000
ERCS(EHRT) .. (1/22/92)	2,624,582*	2,728,840
SITE SPEC. CONTRACT..	---	2,500,000
TOTAL REMEDIAL COSTS..	6,701,438	9,398,840
G. TOTAL PROJECT COSTS..	16,941,591	19,866,355
H. TOTAL UNALLOCATED FUNDS.....		889,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

AR104335

L. ENFORCEMENT (106) COSTS 02/05/92 - 11/30/92

EPA.....	10,146
TAT.....	216,893

M. TOTAL ENFORCEMENT = \$358,188

**N. ARCS AND TAT PERSONNEL ON-SCENE ON A DAILY BASIS.
EPA PERSONNEL ON-SCENE ON A PERIODIC BASIS.**

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, OSC DAW, RPM PALISTINI AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. OSC'S ZENONE AND LAPSLEY INFORMED TAT/ARCS 11/6/92 THAT EPA HAD SENT A LETTER TO JAR'S LAWYER ON 11/04/92 NOTIFYING JAR THAT EPA WAS NOT INCLINED TO GRANT JAR ANY MORE ADDITIONAL TIME TO SUBMIT WORK PLANS, AND ITS DEMOLITION PLAN WAS DUE AND IT MUST LEAVE THE SITE.

C. 11/12/92: OSC LAPSLEY RESPONDED TO ZARROLI'S REQUEST FOR AN ONSITE TOUR OF HIS POTENTIAL CONTRACTOR DISMANTLEMENT CORP. ON NOVEMBER 16-18 THROUGH CORRESPONDENCE. OSC GRANTED ACCESS TO AREAS PERMITTED BY ON-SITE EPA REPRESENTATIVE.

D. 11/13/92: OSC LAPSLEY INFORMED TAT BY TELECOM THAT EPA HAD AUTHORIZED ERM TO MEASURE WWTP DISCHARGE FROM 1000 GPM TO 2000 GPM AND AN ADDITIONAL POLISHING BASIN WOULD BE USED.

E. 11/18/92: OSC ZENONE DENIED ZARROLI'S REQUEST FOR 11/19/92'S SITE VISIT OF HIS POTENTIAL CONTRACTOR (OLVER CORP) THROUGH CORRESPONDENCE. THE REASONS WERE (I) THE NOTICE WAS GIVEN LESS THAN 72 HOURS; (II) SPECIFIC INFORMATION REGARDING THE TECHNICAL QUALIFICATIONS AND RELATIVE PERTINENT EXPERIENCE OF THE PROPOSED CONTRACTORS WERE NEEDED. ON THE LETTER OSC ALSO MENTIONED THAT IT WAS ESSENTIAL FOR ZARROLI TO ENTER ADMINISTRATIVE ORDER TO FACILITATE THE REMOVAL OF ASSETS OFFSITE.

F. 11/20/92: OSC ZENONE INFORMED TAT AND ARCS VIA TELECON THAT A SITE TOUR WAS BEING ARRANGED FOR THE WEEK OF 12/07/92. OSC ALSO RESPONDED TO ARCS AND TAT THAT NCA MANHOLES WITH HIGH READINGS OF H2S SHOULD NOT BE SEALED. WIDER CORDON MAY BE USED TO DRAW ATTENTIONS.

AR104336

G. 11/24/92: OSC LAPSLEY APPROVED Z&A'S REQUEST FOR 11/30/92'S SITE VISIT OF HIS POTENTIAL CONTRACTOR (D-K ERECTORS) VIA TELECON WITH ARCS AND TAT.

H. 11/25/92: OSC COMPLETED COORDINATION OF ACQUISITION MANAGEMENT TEAM ACTIVITIES WITH SUBMISSION OF THE TECHNICAL EVALUATION PANEL CONSENSUS REPORT TO REGIONAL CONTRACTS, CONCERNING THE T&D OF DRUMS.

I. TAT CONTINUE ENFORCEMENT OVERSIGHT OF THIRD PARTY ACTIVITIES AND MONITORING OF WWTP ACTIVITIES. TAT CONTINUE WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE PENDING AWARD OF SITE SPECIFIC CONTRACT. COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT CONTINUES. TAT/ARCS ESCORTED ZARROLI ON 11/24/92 AND Z&A'S POTENTIAL CONTRACTORS, ENRI ENVIRONMENTAL CO. 11/4/92, DISMANTLEMENT CO. 11/16/92, AND D-K ERECTORS 11/30/92, FOR ONSITE TOURS. 11/9/92 TAT/ARCS TO WWTP TO INSPECT THE ERM'S 11/8/92 SLUDGE/ASH SAMPLING LOCATIONS. MAZZA ENGINEERING ASSOCIATES SUBMITTED A COPY OF THEIR HEALTH AND SAFETY PLAN TO COMMAND POST ON 11/9/92. TAT/ARCS REVIEWED THE PLAN AND MONITORED MAZZA'S IN-BUILDING ACTIVITIES 11/9-13/92. TAT RECONNEDED DRUM STORAGE AREA AND WWTP 11/12, 19/92. DRUMS APPEARED TO BE STABLE. WWTP OPERATED NORMALLY. 11/25/92 TAT AND ARCS SPRAY PAINTED TO NCA MANHOLES WHICH H2S READING WERE ABOVE PEL (10PPM) OR STEL (15PPM).

J. FMC/ERM CONTINUED DISCHARGING TREATED WATER TO THE SHENANDOAH RIVER. WATER LEVELS OF ALL THE BASINS REMAINED BELOW THE 2' FREEBOARD LIMIT. FMC'S CONTRACTOR MAZZA ENGINEERING ASSOCIATES (MEA), INC. WERE ONSITE SINCE 11/05/92 FOR PLANT STRUCTURE ASSESSMENT FOR REDEVELOPMENT PURPOSES. THE BUILDING STRUCTURE INSPECTION WAS COMPLETED ON 11/13/92. MEA WILL BE BACK ONSITE 12/2/92 FOR MUNICIPAL (WATER, ELECTRICITY) SUPPLY INSPECTIONS. ERM HAD TAKEN SURFACE AND SUBSURFACE SLUDGE/ASH SAMPLES OVER THE WEEKEND 11/7-8/92 AT VISCOSE BASINS #9-11, SULFATE BASIN #3, AND FLY ASH STOCKPILE AND BASIN #6. RENO PELLISSIER AND W.E. SCHRUCK FROM FMC VISITED SITE ON 11/11/92. ON 11/13/92 ERM CUT DOWN DISCHARGE TO 400 GPM DUE TO LACK OF ACID. THE DISCHARGE WAS BACK TO 800 GPM 11/25/92 AND WILL GRADUALLY INCREASE TO 2000 GPM BY MID OF DECEMBER. 11/30/92 ERM INFORMED ARCS/TAT THAT THEY REMOVED THE LID OF THE MANHOLE NCA-5 AND LEFT A GRID ON TOP OF THE MANHOLE.

AR104337

K. REPETTO (JAR) WAS ON SITE 11/2/92 AND 11/3/92 AT OFFICE AREA. 11/5/92 JAR WAS ONSITE REQUESTING TO TAKE OFFSITE A HYPER THERM (MAX 100) PLASMA CUTTER, WHICH WAS TAKEN OFFSITE 11/11/92 BY UNITED INDUSTRIAL INC. JAR WAS AT FRONT GATE 6:30AM 11/16/92 REQUESTING ACCESS TO SITE. HIS REQUEST HAD BEEN DENIED. JAR LEFT SITE IN TWO MINUTES. THE SAME DAY, THE TRUSTEE'S ON-SITE MANAGER, MINDY SCHRYVER WROTE A MEMO REQUESTING FOR ALL AVTEX VISITORS (EXCEPT Z&A) TO BE ESCORTED BY AVTEX PERSONNEL, OTHERWISE VISIT SHOULD BE DENIED.

III. FUTURE PLANS

A. OSC AWAITS ACCEPTANCE OF THE TEP CONSENSUS REPORT FROM REGIONAL CONTRACTS FOR THE T&D OF DRUMS.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A DAILY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.666

AR104338

POLREP 667

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING SATURDAY 12/12/92.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH SITE SPECIFIC CONTRACT FOR DRUMS.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (12/12/92) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	193,081	195,000
EPA INDIRECT.....	334,854	340,000
TAT	2,031,603	2,050,000
ERCS(OHM)..(04/07/92)..	7,494,499	7,685,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,251,552	10,467,515

F. REMEDIAL COSTS TO (11/30/92)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM)...(4/28/92)	3,141,564*	3,180,000
ERCS(EHRT)..(1/22/92)	2,624,582*	2,728,840
SITE SPEC. CONTRACT..	---	2,500,000
TOTAL REMEDIAL COSTS..	6,701,438	9,398,840
G. TOTAL PROJECT COSTS..	16,941,591	19,866,355
H. TOTAL UNALLOCATED FUNDS.....		889,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

AR104339

L. ENFORCEMENT (106) COSTS 02/05/92 - 12/12/92

EPA.....	10,823
TAT.....	227,236

M. TOTAL ENFORCEMENT = \$369,208

**N. ARCS AND TAT PERSONNEL ON-SCENE ON A DAILY BASIS.
EPA PERSONNEL ON-SCENE ON A PERIODIC BASIS.**

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, OSC DAW, RPM PALISTINI AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. 12/04/92: RPM PALISTINI INFORMED ARCS THAT TWO VISITORS FROM D.C. WOULD VISIT SITE ON 12/07/92 FOR TRAINING DOCUMENTATION FILMING.

C. 12/08/92: OSC ZENONE TASKED TAT/ARCS VIA TELECOM TO INSPECT ALL TRANSFORMERS ONSITE.

D. 12/09/92: OSC ZENONE HELD A MEETING WITH TRUSTEE A.H. MURRAY ONSITE DISCUSSING ABOUT THE STATUS OF ONSITE TRANSFORMERS; OSC REVIEWED AND APPROVED THE DECON PLAN WRITTEN BY AVTEX TO DEMOBE REPETTO'S RENTAL EQUIPMENTS OFFSITE; OSC MET WITH MR. ZARROLI ON-SITE THIS DATE: MR. ZARROLI INDICATED THAT HIS CONTRACTOR SELECTION PROCESS WAS NEARLY COMPLETED AND HE ALSO CONFIRMED HIS INTENTION TO SIGN THE ADMINISTRATIVE ORDER FOR HIS WORK ONSITE; OSC RECEIVED PREPARED DRAFT OF OSC REPORT AND CHRONOLOGY (9/20/89-12/14/91) FROM TAT; OSC ESTABLISHED HOLIDAY SCHEDULE WITH TAT, AND TASKED TAT TO PREPARE DATA PACKAGES ON EPA'S EMERGENCY RESPONSE, REMOVAL, EXPEDITED REMEDIAL EFFORTS, AND ENFORCEMENT RELATED SUBJECTS USING THE TAT GIS.

E. TAT CONTINUE ENFORCEMENT OVERSIGHT OF THIRD PARTY ACTIVITIES AND MONITORING OF WWTP ACTIVITIES. TAT CONTINUE WEEKLY REMOVAL MONITORING OF DRUMS STAGED ONSITE PENDING AWARD OF SITE SPECIFIC CONTRACT. A DRUM AT SHIPPING #1 LABELED '32 BONEYARD 2-17-90' CONTINUED TO SHOW MINOR LEAKAGE. ONE DRUM AT SHIPPING #5 LABELED 'DTE OIL HEAVY MEDIUM, 7-4-17' WAS OBSERVED HAVING MINOR LEAKAGE. COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT CONTINUES. TAT/ARCS ESCORTED 4 STUDENTS FROM SHENANDOAH UNIVERSITY FOR AN ON-SITE TOUR ON 12/04/92; ESCORTED 2 VISITORS FROM D.C. FOR AN ON-SITE TOUR ON 12/07/92. TASKED BY OSC, TAT/ARCS INSPECTED STATUS OF TRANSFORMERS ONSITE ON 12/09/92. TAT ACCOMPANIED ARCS FOR ONSITE INSPECTION OF ALL THE NCA MANHOLES, SPRAY PAINTING CAVITY AREAS

AR104340

IN THE VICINITIES OF THE STAPLE LINES, TESTING PH OF THE ACIDIC SEWER LINES NEAR THE NCA MANHOLES. TAT PREPARED FOR DEMOBILIZING SITE FOR HOLIDAY WEEKLY RECON SCHEDULE 12/11/92 AND WILL CONTINUE WORK ON THE CHRONOLOGY/ DATA PACKAGE MODULE DURING THE HOLIDAY BREAK.

F. FMC/ERM CONTINUED DISCHARGING TREATED WATER TO THE SHENANDOAH RIVER. WATER LEVELS OF ALL THE BASINS REMAINED BELOW THE 2' FREEBOARD LIMIT. ERM CLEANED UP THE SLUDGE IN THE TROUGH 12/03-04/92 AND KNOCKED DOWN THE CONCRETE BLOCK 12/08/92 IN BETWEEN THE POLISHING BASIN #1 AND THE AERATION BASIN IN PREPARATION OF FULL OPERATION OF THE WWTP TO INCREASE DISCHARGING RATE TO 2000 GPM. FMC'S CONTRACTOR MAZZA ENGINEERING ASSOCIATES (MEA), INC. WERE ONSITE 12/03-04/92 FOR MUNICIPAL (WATER, ELECTRICITY) SUPPLY INSPECTIONS. MAZZA'S ASBESTOS SAMPLING RESULT SHOWED 30% OF ACM ON BUILDING ROOF, 50% OF ACM IN ONE OF THE TANKS, 1 % IN VESSELS, AND 20% IN PIPES.

G. AVTEX DECONNED REPETTO'S RENTAL BOBCATS AT WWTP ON 12/09/92 AFTER OSC APPROVED THE DECON PLAN. THE BOBCATS WERE TRANSPORTED OFFSITE THE SAME DAY.

III. FUTURE PLANS

A. OSC AWAITS ACCEPTANCE OF THE TEP CONSENSUS REPORT FROM REGIONAL CONTRACTS FOR THE T&D OF DRUMS.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A WEEKLY BASIS DURING THE HOLIDAY BREAK ON 12/16,23,30/92. TAT TO RECON DRUM STAGING AREAS PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.

AR104341

POLREP 668

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: 12/16/92

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH SITE SPECIFIC CONTRACT FOR DRUMS.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (12/12/92) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	193,081	195,000
EPA INDIRECT.....	334,854	340,000
TAT	2,031,603	2,050,000
ERCS(OHM) (04/07/92) ..	7,494,499	7,685,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,251,552	10,467,515

F. REMEDIAL COSTS TO (11/30/92)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM)... (4/28/92)	3,141,564*	3,180,000
ERCS(EHRT).. (1/22/92)	2,624,582*	2,728,840
SITE SPEC. CONTRACT..	--- *	2,500,000
TOTAL REMEDIAL COSTS.	6,701,438	9,398,840
G. TOTAL PROJECT COSTS..	16,941,591	19,866,355
H. TOTAL UNALLOCATED FUNDS.....		889,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 12/12/92

AR104342

EPA..... 10,823
TAT..... 227,236

M. TOTAL ENFORCEMENT = \$369,208

N. ARCS PERSONNEL ON-SCENE ON A DAILY BASIS. TAT PERSONNEL ON-SCENE ON A WEEKLY BASIS OVER THE HOLIDAY. EPA PERSONNEL ON-SCENE ON A PERIODIC BASIS.

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, OSC DAW, RPM PALISTINI AND ORC WALTERS CONTINUE COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS). RPM GROSS RETURNED FROM DETAIL; TO ASSUME RPM RESPONSIBILITIES.

B. OSC ZENONE WAS INFORMED BY TAT VIA TELECOM THAT DURING TAT'S WEEKLY DRUM ASSESSMENT THIS DATE WHITE MILKY LIQUID WAS OBSERVED ON THE FLOOR OF SHIPPING #5 (WHERE 1162 DRUMS WERE STORED), WHICH COVERED 2/3 OF THE STORAGE AREA FROM NORTH EAST END OF THE SHIPPING #5. THE DEPTH OF WATER AT THE NORTH EAST END WAS ABOUT ONE INCH. NO (H2S OR HCN) READINGS WERE RECORDED FROM MONITOX. TAT REPORTED THE SUSPECTED LEAKING DRUMS AND THE POTENTIAL LEAKAGE THROUGH THE SEWER LINES, AND ASKED FOR APPROVAL FROM OSC TO LET ERM TAKE A SAMPLE OF THE LIQUID FOR WWTP MONITORING. OSC APPROVED THE ERM SAMPLING, ALTHOUGH THE RESPONSE TO THIS INCIDENT INDICATED THE MATERIAL TO BE NON-HAZARDOUS. A DRUM AT SHIPPING #1 LABELED '32 BONEYARD 2-17-90' CONTINUED TO SHOW MINOR LEAKAGE. TAT OBSERVED AND REPORTED THE LEAKAGE OF WHITE MILKY LIQUID ON THE FLOOR OF SHIPPING #5. TAT INVESTIGATED THE POSSIBLE SOURCES:

1. AMONG 'NON-HAZARDOUS' DRUMS LOCATED AT SOUTH EAST OF SHIPPING #5, TAT OBSERVED WHITE ALMOST DRIED LIQUID ON TOP OF DRUMS LABELED "BALANCED POLYMER CF-III" AND MILKY LIQUID AROUND ON THE FLOOR;
2. NEXT TO THOSE "CF-III" WERE DRUMS LABELED "SSC LUBE 661". ACCORDING TO J. JUDD THEY ARE SOAP LIKE LIQUID USED IN THE FINISHING PROCESS;

AR104343

3. AMONG 'UNKOWN' DRUMS LOCATED AT CENTRAL NORTHEAST OF THE SHIPPING #5, WATER WAS OBSERVED DURING THE RAINY DAYS TO POUR DIRECTLY FROM A HOLE CAUSED BY A BROKEN PIPE ON ROOF TO THE TOP OF DRUMS LABELED "SSC 609". FOAM LIKE LEAKAGE HAS BEEN OBSERVED AND REPORTED IN PREVIOUS RECONS.

TAT CONSULTED WITH MANUFACTURERS AND HAVE FOUND OUT THAT THE LUBRICANTS 661 AND 609 (HAVING THE SAME COMPOSITE) DO FORM WHITE LIQUID WHEN MIXED WITH WATER AND THEY HAVE PH OF 7, WHICH CONFIRMED WHAT TAT OBSERVED AND THE TESTED pH BY TAT WAS 7-8, BY ERM 9.3.

TAT/ARCS INSPECTED ACCESS WAYS OF THE LIQUID TO SEWERS AND FOUND OUT A MINOR SEEPING POINT ON THE EAST WALL OF SHIPPING #5, 25 FEET FROM THE NORTH END, AND AN ELECTRICAL CONDUIT ACCESS WAY INSIDE. ARCS ASKED AVTEX SSO J. JUDD TO PLACE ABSORBENT MATERIAL ON THE SEEPING SPOT OUTSIDE OF SHIPPING #5 ON THE EAST CORRIDOR; SANDBAG THE ELECTRICAL ACCESSWAY OF ABSORBENT MATERIAL; AND BLOCK THE EAST CORRIDOR ENTRANCE ACCESS TO SHIPPING #5.

C. TAT CONTINUE MONITORING OF WWTP ACTIVITIES. ERM BEGAN FULL OPERATION AT A DISCHARGE RATE OF 1800 GPM. AT EMERGENCY BASIN THE FREEBOARD READING WAS LESS THAN 2 FEET (1'9") AND ALL OTHER BASINS WITH FB READINGS GREATER THAN 2 FEET. BASIN #4 WAS DRAINED TO FB=6'5".

D. FMC/ERM CONTINUED DISCHARGING TREATED WATER TO THE SHENANDOAH RIVER. EXCEPT FOR EMERGENCY BASIN (FB=1'9"), WATER LEVELS OF ALL THE BASINS REMAINED BELOW THE 2' FREEBOARD LIMIT. ERM CLEANED UP THE SLUDGE IN THE TROUGH AND KNOCKED DOWN THE CONCRETE BLOCK THIS WEEK IN BETWEEN THE POLISHING BASIN #1 AND THE PRIMARY CLARIFIER. THE WWTP IS RUNNING AT A DISCHARGING RATE OF 1800 GPM THIS WEEK.

III. FUTURE PLANS

A. OSC AWAITS ACCEPTANCE OF THE TEP CONSENSUS REPORT FROM REGIONAL CONTRACTS FOR THE T&D OF DRUMS.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A WEEKLY BASIS DURING THE HOLIDAY BREAK ON 12/23/92 AND 12/30/92. TAT TO RECON DRUM STAGING AREAS PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

AR104344

D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY
OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY
POLREPS.

VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.668

Distribution:

TO: HARRY DAW
TO: DEBBIE DIETRICH
TO: OPA /REG.III
TO: ORC REG.III
TO: RRC OFFICE
TO: VINCENT ZENONE

(DAW.HARRY)
(DIETRICH.DEBBIE)
(OPA/REG.III)
(ORC/REG.III)
(RRC)
(ZENONE.VINCENT)

AR104345

POLREP 669

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: MONTH ENDING 1/31/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH SITE SPECIFIC CONTRACT FOR DRUMS.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (1/31/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	193,256	195,000
EPA INDIRECT.....	334,989	340,000
TAT	2,042,106	2,050,000
ERCS(OHM) ..(04/07/92) ..	7,494,499	7,685,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,262,365	10,467,515

F. REMEDIAL COSTS TO (11/30/92)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM) ... (4/28/92)	3,141,564*	3,180,000
ERCS(EHRT) .. (1/22/92)	2,624,582*	2,728,840
SITE SPEC. CONTRACT..	---	2,500,000
TOTAL REMEDIAL COSTS.	6,701,438	9,398,840
G. TOTAL PROJECT COSTS..	16,941,591	19,866,355
H. TOTAL UNALLOCATED FUNDS.....		889,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

AR104346

L. ENFORCEMENT (106) COSTS 02/05/92 - 1/31/93

EPA.....	10,823
TAT.....	256,310

M. TOTAL ENFORCEMENT = \$398,282

**N. ARCS AND TAT PERSONNEL ON-SCENE ON A DAILY BASIS.
EPA PERSONNEL ON-SCENE ON A PERIODIC BASIS.**

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, OSC DAW, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. 1/7/93: A LETTER FROM OFFICE OF SUPERFUND, EPA TO REPETTO (JAR) REGARDING POTENTIAL LIABILITY ARRIVED ON SITE THIS DATE. AVTEX REP. MINDY SCHRYVER INFORMED JAR OF THE LETTER VIA TELECOM 1/8/93. HOWEVER, JAR DID NOT SHOW UP ONSITE TO PICK UP THE LETTER AS HE MENTIONED HE WOULD. THE LETTER WAS STILL ONSITE AS OF 1/31/93.

C. 1/25/93 RPM GROSS VIA TELECOM GRANTED THE PERMISSION TO AVTEX TO TAKE SAMPLES ON ZINC SLUDGE AT FLY ASH BASINS THIS DATE.

D. 1/26/93 WARREN COUNTY ESC DON DERNER WAS ON SITE THIS DATE FOR AN ON-TOUCH BASIS CONTACT WITH EPA REPS ARCS/TAT.

E. TAT CONTINUE ENFORCEMENT OVERSIGHT OF THIRD PARTY ACTIVITIES AND MONITORING OF WWTP ACTIVITIES. TAT CONTINUE WEEKLY REMOVAL MONITORING OF DRUMS STAGED ONSITE PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT CONTINUE COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE.

F. TAT/ARCS WERE ONSITE INSPECTING ALL THE SECURED AREAS IN PLANT BUILDINGS 1/5/93. DURING WEEKLY DRUM RECONS TAT FOUND THAT THE DRUM AT SHIPPING #1 LABELED '32 BONEYARD 2-17-90' CONTINUED TO SHOW MINOR LEAKAGE. TWO INCHES OF PRECIPITATION WAS RECEIVED DURING THIS MONTH. THE MILKY WHITE LIQUID OBSERVED 12/16/93 AT SHIPPING #5 LASTED FOR APPROXIMATELY A MONTH. ICY STANDING WATER WAS OBSERVED ON TOP OF DRUMS AND ON THE FLOORS AT SHIPPING #1, #5, AND PULP STORAGE AREAS THIS MONTH. AVTEX SSO JUDD TEMPORARILY FIXED THE BROKEN SKYLIGHT ON THE ROOF OF SHIPPING #5 1/4/93.

AR104347

G. FMC/ERM DISCONTINUED DISCHARGING TREATED WATER TO THE SHENANDOAH RIVER 12/31/92. WATER LEVELS OF ALL THE BASINS REMAINED BELOW THE 2' FREEBOARD LIMIT. ERM WORKED THIS MONTH ON CLEANING UP THE PRIMARY AND SECOND CLARIFIERS AND THE AERATION BASIN HAD BEEN PUMPED EMPTY FOR CLEANING. FMC PELLISSIER AND FMC VICE PRESIDENT KIRBY HAD A SITE TOUR ON 1/21/93.

H. SECURITY GUARD FOUND FOUR TRESPASSERS DURING THEIR REGULAR PATROL 1/18/93. TRESPASSERS WERE TRANSPORTED TO THE GUARD OFFICE AND FRONT ROYAL POLICE WAS ON SCENE.

I. 1/11/93 AVTEX REP SCHRYVER INFORMED ARCS THAT AVTEX RECEIVED A FAX FROM REPETTO'S ATTORNEYS THIS DATE THAT THEY WOULD NO LONGER REPRESENT JAR AS OF THE DAY OF THE FAX RECEIVED.

J. 1/27/93 MR. TERRY LUNDSFORD OF TENNEY RIGGING CO. WAS ONSITE THIS DATE FOR COLLECTING ZINC SLUDGE SAMPLES FROM SULFATE BASIN #1. MR. LUNDSFORD EVENTUALLY DID NOT TAKE ANY SAMPLE, HOWEVER, REQUESTED FOR A SITE TOUR TO THE POWER HOUSE TO EXAM REMAINING TURBINES FOR THE PURPOSE OF PLACING A BID ON THEM.

III. FUTURE PLANS

A. OSC AWAITS ACCEPTANCE OF THE TEP CONSENSUS REPORT FROM REGIONAL CONTRACTS FOR THE T&D OF DRUMS.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A DAILY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, CHRONOLOGY AND SITE DATA PACKAGING.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.669

AR104348

POLREP 670
 AVTEX FIBERS FRONT ROYAL
 FRONT ROYAL, WARREN COUNTY, VA.
 CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION
 ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN
 CC:BONNIE GROSS (3HW24)
 WAYNE WALTERS (3RC21)

I. SITUATION: MONTH ENDING 2/28/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH SITE SPECIFIC CONTRACT FOR DRUMS.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (2/28/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	193,256	195,000
EPA INDIRECT.....	334,989	340,000
TAT	2,045,835	2,050,000
ERCS(OHM) .(04/07/92) .	7,494,499	7,685,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,266,094	10,467,515

F. REMEDIAL COSTS TO (02/28/93)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM) ... (4/28/92)	3,141,564*	3,180,000
ERCS(EHRT) .. (1/22/92)	2,624,582*	2,728,840
SITE SPEC. CONTRACT..	---	2,500,000
TOTAL REMEDIAL COSTS.	6,701,438	9,398,840
G. TOTAL PROJECT COSTS..	16,941,591	19,866,355
H. TOTAL UNALLOCATED FUNDS.....		889,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

AR104349

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 2/28/93

EPA.....	12,609
TAT.....	275,142

M. TOTAL ENFORCEMENT = \$418,900

N. ARCS AND TAT PERSONNEL ON-SCENE ON A DAILY BASIS.
EPA PERSONNEL ON-SCENE ON A PERIODIC BASIS.

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. 2/1/93: REGIONAL CONTRACTS SUBMITTED ITS COMPETITIVE RANGE REPORT, BASED UPON THE TEP CONSENSUS REPORT TO EPA HQ FOR CONCURRENCE.

C. 2/9/93: RPM GROSS AND OSC LAPSLEY WERE INFORMED BY ARCS/TAT THAT ERM INTENDED TO BLAST PAINT OFF THE METAL SUPPORTER ABOVE AERATION BASIN ON 2/15/93, AND THAT SAMPLES ANALYZED FOR LEAD COMPONENT MIGHT BE NEEDED BEFORE WORK TO BE STARTED.

D. 2/12/93: OSC LAPSLEY REQUESTED TAT/ARCS VIA TELECOM TO RELAY MESSAGE TO ERM THAT SAND BLASTING OF THE METAL SUPPORTER ABOVE THE AERATION BASIN COULD NOT OCCUR BEFORE PAINT CHIPS WERE ANALYZED.

E. 2/15/93: OSC ZENONE RECEIVED A PHONE MESSAGE FROM REPETTO (JAR) THIS DATE TO INFORM OSC THAT HE HAD JUST RECEIVED THE LETTER FROM EPA DATED 1/4/93, AND THAT HE WOULD SUBMIT THE DEMOBILIZATION PLAN ON FRIDAY, 2/19/93.

F. 2/17/93: OSC'S ZENONE AND LAPSLEY WERE ONSITE FOR TESTIFYING ERM'S REQUEST OF CONNECTING STORM SEWER DIRECTING TO THE RIVER WITHOUT TREATMENT.

G. TAT CONTINUE ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES. TAT CONTINUE WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT CONTINUE COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE. TAT'S ON-SITE ACTIVITIES WERE REDUCED AT THE DIRECTION OF OSC ZENONE TO TWO-THREE DAYS A WEEK STARTING

AR104350

2/22/93: ONE DAY FOR WEEKLY DRUM AND WWTP RECON, ONE-TWO DAYS FOR DATA PACKAGING AND SITE FILE MANAGEMENT. WHEN THE DATA MANAGEMENT IS COMPLETE, THE TAT WILL BE ON-SITE ONE-TWO DAYS A WEEK UNTIL THE SITE-SPECIFIC CONTRACT IS AWARDED.

H. 2/4/93 & 2/11/93: DRUM STAGING AREAS WERE RELATIVELY DRY. DURING WEEKLY DRUM RECONS TAT FOUND THAT THE DRUMS AT SHIPPING #5 LABELED "1188L 6.01.2 NHL", "SOUTHERN 661", "2.05.ONHS, ALUMINUM SULFATE", "MOBIL LUBRICATING OIL", AND "UNK 98126-C" APPEARED TO HAVE LEAK PROBLEMS. LATER OF THE MONTH 1.1 INCHES OF PRECIPITATION WAS RECEIVED AT AVTEX FIBERS. STANDING WATER COULD BE OBSERVED ACCUMULATING ON THE FLOORS AND ON THE DRUMS.

I. ARCS/TAT INSPECTED THE RADIOACTIVE TUBE ON-SITE AT WWTP 2/12/93. ARCS SEALED OFF POTS/POTTY, OLD MANAGER'S OFFICES (2/12/93), AND JAR'S OFFICE AREA (2/15/93) TO SECURE THOSE AREAS. ARCS/TAT ESCORTED ZARROLI'S VISITOR MR. JOHN PHIPPS FOR AN ON-SITE TOUR ON 2/17/93. ARCS/TAT ESCORTED ZARROLI'S VISITORS FROM MEXICO FOR ON-SITE TOURS ON 2/23/93-2/24/93.

J. FMC/ERM DISCONTINUED DISCHARGING TREATED WATER TO THE SHENANDOAH RIVER 12/31/92. WATER LEVELS OF ALL THE BASINS REMAINED BELOW THE 2' FREEBOARD LIMIT. BECAUSE OF THE WINTER CONDITION ERM WORKED THIS MONTH ON IN-HOUSE CLEANING AND PAINTING. ERM PERSONNEL MOVED THE MUD CAT FROM THE FLY ASH BASIN #6 TO THE TREATMENT PLANT AREA FOR INSPECTION, REPAIRING AND POSSIBLE RE-USE AT THE LAGOON AREA 2/4/93. FMC PELLISSIER WAS ON-SITE DURING THIS EVENT. ERM COLLECTED PAINT CHIP SAMPLES ON 2/15/93. ERM CLOSED THE ROADWAY IN BETWEEN THE TWO CHEMICAL TREATING TANKS DUE TO SECURITY REASONS ON 2/25/93.

K. A.H. MURRAY (AVTEX), DAVID WHITESTONE (AIDE OF CONGRESSMAN FRANK WOLF), AND KATE BLOW (EIM/FMC) HAD AN ON-SITE TOUR ON 2/9/93. ARCS/TAT ESCORTED THE TOUR. MINDY SCHRYVER (AVTEX) FORWARDED ALL JAR'S MAILS TO HIM 2/4/93.

III. FUTURE PLANS

A. OSC AWAITS EPA-HQ ACCEPTANCE OF REGIONAL CONTRACTS-COMPETITIVE RANGE REPORT. UPON EPA-HQ APPROVAL, TEP TO RECONVENE TO FORMALIZE THE INTERROGATORIES TO BE SUBMITTED TO THE CONTRACTORS WHOSE BIDS HAVE BEEN DETERMINED TO BE IN THE COMPETITIVE RANGE.

AR104351

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A WEEKLY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, CHRONOLOGY AND SITE DATA PACKAGING.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.670

AR104352

POLREP 671

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: MONTH ENDING 3/31/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH SITE SPECIFIC CONTRACT FOR DRUMS.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (3/31/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	193,256	195,000
EPA INDIRECT.....	334,989	340,000
TAT	2,048,025	2,050,000
ERCS(OHM) .(04/07/92) .	7,494,499	7,685,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,268,284	10,467,515

F. REMEDIAL COSTS TO (03/31/93)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM) ... (4/28/92)	3,141,564*	3,180,000
ERCS(EHRT) .. (1/22/92)	2,624,582*	2,728,840
SITE SPEC. CONTRACT..	---	2,500,000
TOTAL REMEDIAL COSTS.	6,701,438	9,398,840

G. TOTAL PROJECT COSTS.. 16,941,591 19,866,355

H. TOTAL UNALLOCATED FUNDS..... 889,620

I. TOTAL PROJECT CEILING..... 20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

AR104353

L. ENFORCEMENT (106) COSTS 02/05/92 - 3/31/93

EPA.....	12,609
TAT.....	286,356

M. TOTAL ENFORCEMENT = \$430,104

N. ARCS PERSONNEL ON-SCENE ON A DAILY BASIS. TAT PERSONNEL ON-SCENE ON A WEEKLY AND AS NEEDED BASIS. EPA PERSONNEL ON-SCENE ON A PERIODIC BASIS.

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. 03/18/93-03/19/93: OSC ZENONE AND FAS McDONALD WERE ON-SITE PACKING AND CONSOLIDATING ALL THE ON-SITE FILES TO PHILI OFFICE TO BE USED BY OSC FOR RESPONDING TO THE FREE-INFORMATION REQUESTS.

C. RPM GROSS WAS ON SITE 3/25/93 WITH PUBLIC RELATIONS OFFICER GAUGHAN AND MR. MARSHALL OF CLOVERLEAF ENVIRONMENTAL, INC. (WHO IS CONSULTING THE COMMUNITY UNDER A TECHNICAL ASSISTANCE GRANT) FOR AN ORIENTATION TOUR FOR MR. MARSHALL.

D. TAT CONTINUE ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES. TAT CONTINUE WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT CONTINUE COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE.

E. FOR THE MONTH OF MARCH, FRONT ROYAL RECEIVED MORE THAN 7" OF RAINFALL. FRONT ROYAL ALSO RECEIVED 18"-24" OF SNOW ON 3/13/93-3/14/93. THE FREEBOARD READINGS AT THE WWTP SULFATE BASINS WERE LESS THAN THE 2-FOOT LIMITS THIS MONTH. THE SHENANDOAH RIVER OVERFLOWED ITS BANKS 3/5/93. THE WATER LEVEL WAS 482' (MORE THAN 12' HIGHER THAN NORMAL) AS RECORDED AT 09:30 AM ON 3/5/93. ERM RESUMED THE WWTP OPERATION 3/4/93. ON 03/08/93 TAT/ARCS WERE ON-SITE AND NOTICED THAT ERM PERSONNEL WERE DISCHARGING THE "FLOODED STORM WATER" IN THE AERATION BASIN AND THE FINAL CLARIFIER DIRECTLY INTO THE SHENANDOAH RIVER. TAT REPORTED TO OSCS ZENONE AND LAPSLEY OF THIS ISSUE. ON 03/12/93 OSC LAPSLEY INFORMED TAT/ARCS THAT NO DISCHARGE WAS ALLOWED WITHOUT TREATMENT. ERM RESUMED DISCHARGING TREATED WATER ON 3/15/93 AT A RATE APPROXIMATELY 1400-2000 GPM.

AR104354

F. A SODA-TANK LEAK INCIDENT WAS REPORTED ON 3/22/93 BY ARCS KOEHLER. #1 SODA TANK AT SOUTH OF THE DEMOLISHED ACID RECLAIM FACILITY WAS LEAKING AT A RATE ESTIMATED TO 5 GPM FROM 16:00PM TILL 23:00PM THAT DATE. A pH MEASUREMENT SHOWED A VALUE OF 10.6. BASED ON THE JUDGEMENT THAT THE EXISTING LEAK DID NOT POSE A SERIOUS AND IMMEDIATE THREAT TO PERSONNEL ON-SITE OR THE SURROUNDING COMMUNITY, ARCS DID NOT TAKE FURTHER ACTION AND APPROXIMATELY 2000 GALLONS OF SODIUM HYDROXIDE/WATER SOLUTION LEAKED TO THE GROUND ON-SITE. ON 7:00AM WEDNESDAY 3/24/93 THE ERM LOGBOOK AT THE WWTP RECORDED pH OF 8.6 AT THE D-26 CHEMICAL SEWER, 8.0 AT THE STORM SEWER. IT MIGHT BE AN INDICATION THAT THE LEAKED-TO-GROUND CAUSTIC SODA DRAINED THROUGH D-2, A-61, AND A-25 MANHOLES NEAR THE #1 SODA TANK INTO THE CHEMICAL AND STORM SEWERS. AT 15:25PM 3/24/93 #1 SODA TANK WAS LEAKING AGAIN. UPON ARCS' REQUEST TAT WERE ON-SCENE. ARCS/TAT MEASURED pH TO BE 12.4. ON 3/25/93 ARCS SHOWED TO RPM GROSS THE LEAKING TANK PROBLEM AND DISCUSSED ABOUT THE POSSIBLE REMEDIES TO THE PROBLEM.

G. FOR THE MONTH OF MARCH, FRONT ROYAL RECEIVED RECORD HIGH AMOUNTS OF RAINFALL AND SNOW. DURING THE WEEKLY ASSESSMENT OF THE STAGED DRUMS, TAT NOTICED MOST OF THE DRUMS WERE SOAKED IN THE RAINWATER IN SHIPPING #1, SHIPPING #5, AND PART OF THE AREA OF PULP STORAGE #2. ESPECIALLY THOSE FIBER DRUMS AT THE NORTHEAST END OF SHIPPING #5 PRESENTED SEVERE DAMAGE.

H. OSC ZENONE WAS INFORMED BY REGIONAL CONTRACTS THAT EPA-HQ OGC HAD NUMEROUS COMMENTS ABOUT THE TEP CONSENSUS REPORTS AND THEREFORE THE CONTRACT AWARD WOULD BE DELAYED AT LEAST UNTIL JUNE. OSC AND RPM EXPRESSED INCREASING CONCERNS ABOUT THE CHANGE IN CONDITIONS ON-SITE. TO QUANTIFY HIS CONCERNS, OSC ZENONE AND RPM GROSS TASKED ARCS/TAT TO CONDUCT A DRUM ASSESSMENT. THE ASSESSMENT WAS COMPLETED 3/29/93 WITH APPROXIMATELY 1/3 OF THE DRUMS REQUIRED ACTION SUCH AS OVERPACKING.

I. ASSISTED BY THE SECURITY GUARDS, AVTEX TESTED PLANT ALARM SYSTEM ON 3/22/93. THE ALARM TESTING WILL BECOME A MONTHLY EVENT AFTER THIS FIRST TEST FOR IDENTIFYING THE SYSTEM LOCATIONS.

AR104355

III. FUTURE PLANS

A. OSC AWAITS EPA-HQ ACCEPTANCE OF REGIONAL CONTRACTS-COMPETITIVE RANGE REPORT. UPON EPA-HQ APPROVAL, TEP TO RECONVENE TO FORMALIZE THE INTEROGGATORIES TO BE SUBMITTED TO THE CONTRACTORS WHOSE BIDS HAVE BEEN DETERMINED TO BE IN THE COMPETITIVE RANGE.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A WEEKLY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

**VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.671**

AR104356

POLREP 672

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: MONTH ENDING 4/30/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH SITE SPECIFIC CONTRACT FOR DRUMS.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (4/30/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	193,256	195,000
EPA INDIRECT.....	334,989	340,000
TAT	2,049,792	2,100,000
ERCS(OHM) .. (04/07/92) ..	7,494,499	7,685,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,270,051	10,517,515

F. REMEDIAL COSTS TO (04/30/93)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM) ... (4/28/92) \	3,141,564*	3,180,000
ERCS(EHRT) .. (1/22/92)	2,624,582*	2,728,840
SITE SPEC. CONTRACT..	---	2,500,000
TOTAL REMEDIAL COSTS.	6,701,438	9,398,840

G. TOTAL PROJECT COSTS.. 16,941,591 19,916,355

H. TOTAL UNALLOCATED FUNDS..... 839,620

I. TOTAL PROJECT CEILING..... 20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

AR104357

L. ENFORCEMENT (106) COSTS 02/05/92 - 4/30/93

EPA.....	12,609
TAT.....	297,632

M. TOTAL ENFORCEMENT = \$441,390

N. ARCS PERSONNEL ON-SCENE ON A DAILY BASIS. TAT PERSONNEL ON-SCENE ON A WEEKLY AND AS NEEDED BASIS. EPA PERSONNEL ON-SCENE ON A PERIODIC BASIS.

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. 4/9/93: OSC ZENONE RECOMMENDED TO REGIONAL MANAGEMENT THAT SITE SPECIFIC CONTRACT MECHANISM FOR THE TRANSPORT AND DISPOSAL OF THE DRUMS BE RECONSIDERED DUE TO THE CHANGES IN THE CONDITIONS OF THE DRUMS ON-SITE. HWMD DIRECTOR VOLTAGGIO FORMALLY REQUESTED THAT THE SITE SPECIFIC CONTRACT SOLICITATION BE CANCELLED VIA CORRESPONDENCE TO DEPUTY REGIONAL ADMINISTRATOR WISNIEWSKI. DRA WISNIEWSKI CONCURRED AND SUBMITTED REQUEST TO EPA-HQ FOR CONCURRENCE.

C. 4/29/93: OSC'S ZENONE AND LAPSLEY COORDINATED ON-SITE PRESENTATION AND TOUR OF THE SITE FOR EPA-HQ OFFICIALS MARK HJUNEES AND STEVE LUFTIG AND A CONTINGENT REPRESENTING THE AUSTRIAN MINISTER OF ENVIRONMENT.

D. 4/29/93: VIA TELECOM WITH TAT, DPO KAREN TOMIMATSU, OSC ZENONE EXTENDED TDDS FOR CONTINUED REMOVAL, ENFORCEMENT AND REMEDIAL TAT SUPPORT.

E. TAT CONTINUE ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES. TAT CONTINUE WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT CONTINUE COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE.

F. FOR THE MONTH OF APRIL, AVTEX RECEIVED MORE THAN 5" OF RAINFALL. THE FREEBOARD READINGS AT THE WWTP SULFATE BASINS WERE BACK TO ABOVE THE 2-FOOT LIMITS MID THIS MONTH. ERM RESUMED THE WWTP OPERATION SINCE 3/4/93. THE DISCHARGING RATE WAS APPROXIMATELY 2000 GPM UNTIL 4/16/93. ERM SHUT DOWN THE PLANT ON 4/16/93 EVENING AFTER RECEIVING THE SAMPLE RESULTS FROM THE LAB WHICH SHOWED HIGH ZINC LEVELS IN THE EFFLUENT. THE

AR104358

PLANT OPERATION WAS RESUMED WITH A DISCHARGE RATE 1000 GPM MONDAY (4/19/93) AFTER ERM BYPASSED THE POLISHING BASINS. ERM BEGAN RUNNING TWO SHIFTS (8 HOURS EACH SHIFT) DURING THE WEEKDAYS AND CEASE OPERATION OF THE PLANT DURING THE WEEKENDS EFFECTIVE 4/19/93.

G. ARCS CONTINUED ON-SITE TANK ASSESSMENT. NINE TANKS HAVE BEEN INSPECTED THIS MONTH, INCLUDING FIVE HYDROXIDE TANKS, ONE SULFURIC ACID TANK, ONE FUEL OIL TANK, AND TWO PCB CONTAMINATED WATER TANKS. THE ASSESSMENT INCLUDES DETERMINING THE DIMENSION OF THE TANK, QUANTITY OF MATERIAL REMAINS IN THE TANK, THE CONDITION OF TANK: LEAKING OR OTHER POTENTIAL PROBLEMS PRESENTED.

H. AFTER THE SEVERE RAIN OVER THE MONTH OF MARCH AND BEGINNING OF APRIL, TAT CONDUCTED UP-TO-DATE DRUM CONDITION SURVEY DURING THE WEEKLY ASSESSMENT OF THE STAGED DRUMS. INCLUDING ALL ODD-SIZE CONTAINERS, CRUMB CANS, WRANGLER BOXES, AND STAGED PCB BATTERIES, TAT COUNTED GRAND TOTAL 3513 DRUMS STAGED IN SHIPPING #1, #5, BEAM STORAGE, AND PULP STORAGE #1 AND #2 AREAS. OVER 2/3 OF THE DRUMS WERE STAGED IN SHIPPING #1 AND #5, AND 1/6 IN PULP STORAGE #1. 1/2 OF THE DRUMS ARE 55-GALLON 17H/17E TYPE, AND 1/4 OF THE DRUMS HAVE BEEN OVERPACKED. ABOUT 1/2 OF THE DRUMS HAVE UNKNOWN CONTENTS. NOT CONSIDERING ALL THOSE OVERPACKED DRUMS, "EMPTY" DRUMS, AND ODD-SIZE CONTAINERS, TAT COUNTED OVER 1/5 OF THE DRUMS NEEDED OVERPACK. AN ASSESSMENT REPORT WAS SUBMITTED TO OSC ZENONE AFTER THE INSPECTION WAS COMPLETED.

I. AVTEX SSO JERRY JUDD APPROACHED TAT ON 4/15/93 THAT HE WOULD LIKE TO MODIFY AVTEX'S WORK PLAN FOR SALVAGE OF THE 'UNUSED' 'UNOPENED' DRUMS, AND WOULD LIKE TAT TO COORDINATE THE LABELING OF THOSE DRUMS WITH HIM. TAT ADVISED JUDD TO SUBMIT HIS REQUEST IN WRITING TO OSC/RPM FOR EPA APPROVAL.

J. MR. ANTHONY MURRAY (TRUSTEE) INFORMED MINDY SCHRYVER, THE AVTEX ON-SITE MANAGER, ON 4/22/93 THAT EXCEPT FOR MRS. SCHRYVER HE WAS TO RELEASE ALL OTHER ON-SITE EMPLOYEES EFFECTIVE APRIL 23, 1993. THE PERSONNEL AFFECTED INCLUDE JERRY JUDD, THE SITE SAFETY OFFICER; DONALD MILLS AND TERRY STEIN, THE MAINTENANCE PERSONNEL.

AR104359

III. FUTURE PLANS

A. OSC AWAITS EPA-HQ CONCURRENCE TO CANCEL SITE SPECIFIC CONTRACT DUE TO CHANGES IN THE CONDITIONS OF THE DRUMS STAGED ON-SITE. UPON EPA-HQ CONCURRENCE, OSC TO UTILIZE ERCS TO CONDUCT THE EXPEDITED REMEDIAL ACTION.

B. OSC'S ZENONE AND ENGLISH TO BE ON-SITE WEEK OF 5/10/93 TO COORDINATE A REMOVAL EVALUATION OF THE TANKS CURRENTLY BEING INVESTIGATED BY THE REMEDIAL CONTRACTOR ON-SITE.

C. OSC LAPSLEY TO CONSIDER TRUSTEE'S PLAN TO RELEASE HSO AND MAINTENANCE PERSONNEL TO DETERMINE IF TRUSTEE IS IN COMPLIANCE WITH THE ADMINISTRATIVE ORDER.

D. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A WEEKLY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING AWARD OF SITE SPECIFIC CONTRACT. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING.

E. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

F. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

**VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.672**

AR104360

POLREP 673

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: MONTH ENDING 5/31/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ENGLISH ASSIGNED TO RELIEVE OSC ZENONE FOR FUTURE REMOVAL-LED ACTIVITIES ON-SITE. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH ERCS FOR DRUM REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (5/31/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	193,256	195,000
EPA INDIRECT.....	334,989	340,000
TAT	2,053,751	2,100,000
ERCS(OHM)....(04/07/92) ..	7,494,499	7,685,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,274,010	10,517,515

F. REMEDIAL COSTS TO (05/31/93)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM)....(4/28/92) ..	3,141,564*	3,180,000
ERCS(EHRT)..(1/22/92) ..	2,624,582*	2,728,840
ERCS (PENDING OBLIGATION) --- *		2,500,000
TOTAL REMEDIAL COSTS.	6,701,438	9,398,840

G. TOTAL PROJECT COSTS.. 16,941,591 19,916,355

H. TOTAL UNALLOCATED FUNDS..... 839,620

I. TOTAL PROJECT CEILING..... 20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

AR104361

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 5/31/93

EPA.....	12,609
TAT.....	308,059

M. TOTAL ENFORCEMENT = \$451,817

N. ARCS PERSONNEL ON-SCENE ON A DAILY BASIS. TAT PERSONNEL ON-SCENE ON A WEEKLY AND AS NEEDED BASIS. EPA PERSONNEL ON-SCENE ON A PERIODIC BASIS.

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, OSC ENGLISH, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. 5/6/93: EPA-HQ CONCURRED WITH REGIONAL REQUEST TO CANCEL THE SOLICITATION FOR A SITE-SPECIFIC CONTRACT FOR THE T&D OF DRUMS.

C. CAUSTIC SODA TANK #1 WAS OBSERVED AND REPORTED BY THE SECURITY GUARD TO BE LEAKING STEADILY THIS MONTH. THE LEAK RATE WAS ESTIMATED TO BE APPROXIMATELY 3-4 GALLONS PER HOUR.

D. ARCS INSPECTED SEVEN ON-SITE TANKS THE FIRST WEEK OF MAY: SIX POLYMER PLANT TANKS (FOUR FUEL OIL TANKS AND TWO ETHYLENE GLYCOL TANKS), AND ONE ZINC SLUDGE HOLDING TANK. THE INVESTIGATION INCLUDED THE DIMENSION, LOCATION, CONTENT, TANK TYPE, CAPACITY, VOLUME OF THE CONTENT, AND THE CONDITION OF THE TANK. THIS INFORMATION WAS PASSED ALONG TO OSC ZENONE VIA RPM GROSS.

E. 5/11/93-5/13/93: OSCS ZENONE AND ENGLISH WERE ON-SITE COORDINATING A REMOVAL EVALUATION OF THE BULK CHEMICAL STORAGE TANKS. TAT/ARCS WERE TASKED BY THE OSCS TO ASSIST IN THE ON-SITE ASSESSMENT TOUR ON 5/12/93 TO MONITOR THE LEAKING TANKS, AND TO PREPARE THE ASSESSMENT REPORT.

F. 5/17/93: TRUSTEE MURRY INFORMED OSC ZENONE THAT HE WAS IN NEGOTIATIONS WITH FMC TO FACILITATE THE REMOVAL OF THE CAUSTIC SODA AS AN ASSET.

AR104362

G. ON 5/18/93-5/19/93 ZARROLI & ASSOCIATES CONDUCTED A SITE TOUR FOR ITS CONTRACTORS U.S. DISMANTLEMENT CORP. AND PDG ENVIRONMENTAL. THE PURPOSE OF THE TOUR WAS TO VIEW PURCHASED ASSETS FOR THE CONTRACTORS TO PREPARE THE WORK PLANS FOR THE ASSET REMOVAL. ARCS KOEHLER ESCORTED THE TOUR.

H. ON 5/26/93 ARCS KOEHLER PROVIDED A 200 ml CAUSTIC SODA SAMPLE COLLECTED FROM THE TANK #1 BREACH TO ERM AS REQUESTED BY FMC PELLESIER. FMC/ERM IS TO RUN A SERIES OF EXPERIMENTS TO INVESTIGATE THE POSSIBILITY OF SUBSTITUTING THE LIME USED IN THE WWTP PROCESS WITH THE SODIUM HYDROXIDE.

I. TASKED BY OSC ZENONE/RPM GROSS, ARCS PREPARED A REPORT ON SAMPLING OPTIONS FOR THE CHEMICAL STORAGE TANKS AND SUBMITTED TO RPM GROSS ON 5/28/93. TASKED BY OSC ARCS/TAT ARE TO CONTINUE ON-SITE TANK ASSESSMENT.

J. TAT CONTINUE ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES. TAT CONTINUE WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE. TAT CONTINUE TO MONITOR LEAKING TANKS ON-SITE. TAT CONTINUE COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE.

K. FOR THE MONTH OF MAY, AVTEX RECEIVED 1.95" OF RAINFALL. THE FREEBOARD READINGS AT THE WWTP SULFATE BASINS WERE BACK TO ABOVE THE 2-FOOT LIMITS THIS MONTH. ERM RESUMED THE WWTP OPERATION SINCE 3/4/93. THE DISCHARGING RATE CONTINUED TO BE REMAINED AT APPROXIMATELY 1000 GPM THIS MONTH AFTER RECEIVING THE SAMPLE RESULTS FROM THE LAB WHICH SHOWED HIGH ZINC LEVELS IN THE EFFLUENT ON 4/16/93. ERM/FMC VISITORS WERE ON-SITE 5/11/93 FOR SITE TOUR TO PREPARE FOR SI ACTIVITIES EXPECTED TO BEGIN IN JUNE.

L. DURING THE WEEKLY RECON OF THE STAGED DRUMS, TAT OBSERVED AND REPORTED SEVERAL LEAKING DRUMS, ESPECIALLY IN SHIPPING #1 AND #5 AREAS.

M. A HELICOPTER HAD AN EMERGENCY LANDING FOR ABOUT 90 MINUTES ON THE SITE IN THE GRAVEL AREA EAST OF THE RAILROAD BRIDGE 5/12/93 DUE TO SEVERE WEATHER.

AR104363

PLANT OPERATION WAS RESUMED WITH A DISCHARGE RATE 1000 GPM MONDAY (4/19/93) AFTER ERM BYPASSED THE POLISHING BASINS. ERM BEGAN RUNNING TWO SHIFTS (8 HOURS EACH SHIFT) DURING THE WEEKDAYS AND CEASE OPERATION OF THE PLANT DURING THE WEEKENDS EFFECTIVE 4/19/93.

G. ARCS CONTINUED ON-SITE TANK ASSESSMENT. NINE TANKS HAVE BEEN INSPECTED THIS MONTH, INCLUDING FIVE HYDROXIDE TANKS, ONE SULFURIC ACID TANK, ONE FUEL OIL TANK, AND TWO PCB CONTAMINATED WATER TANKS. THE ASSESSMENT INCLUDES DETERMINING THE DIMENSION OF THE TANK, QUANTITY OF MATERIAL REMAINS IN THE TANK, THE CONDITION OF TANK: LEAKING OR OTHER POTENTIAL PROBLEMS PRESENTED.

H. AFTER THE SEVERE RAIN OVER THE MONTH OF MARCH AND BEGINNING OF APRIL, TAT CONDUCTED UP-TO-DATE DRUM CONDITION SURVEY DURING THE WEEKLY ASSESSMENT OF THE STAGED DRUMS. INCLUDING ALL ODD-SIZE CONTAINERS, CRUMB CANS, WRANGLER BOXES, AND STAGED PCB BATTERIES, TAT COUNTED GRAND TOTAL 3513 DRUMS STAGED IN SHIPPING #1, #5, BEAM STORAGE, AND PULP STORAGE #1 AND #2 AREAS. OVER 2/3 OF THE DRUMS WERE STAGED IN SHIPPING #1 AND #5, AND 1/6 IN PULP STORAGE #1. 1/2 OF THE DRUMS ARE 55-GALLON 17H/17E TYPE, AND 1/4 OF THE DRUMS HAVE BEEN OVERPACKED. ABOUT 1/2 OF THE DRUMS HAVE UNKNOWN CONTENTS. NOT CONSIDERING ALL THOSE OVERPACKED DRUMS, "EMPTY" DRUMS, AND ODD-SIZE CONTAINERS, TAT COUNTED OVER 1/5 OF THE DRUMS NEEDED OVERPACK. AN ASSESSMENT REPORT WAS SUBMITTED TO OSC ZENONE AFTER THE INSPECTION WAS COMPLETED.

I. AVTEX SSO JERRY JUDD APPROACHED TAT ON 4/15/93 THAT HE WOULD LIKE TO MODIFY AVTEX'S WORK PLAN FOR SALVAGE OF THE 'UNUSED' 'UNOPENED' DRUMS, AND WOULD LIKE TAT TO COORDINATE THE LABELING OF THOSE DRUMS WITH HIM. TAT ADVISED JUDD TO SUBMIT HIS REQUEST IN WRITING TO OSC/RPM FOR EPA APPROVAL.

J. MR. ANTHONY MURRAY (TRUSTEE) INFORMED MINDY SCHRYVER, THE AVTEX ON-SITE MANAGER, ON 4/22/93 THAT EXCEPT FOR MRS. SCHRYVER HE WAS TO RELEASE ALL OTHER ON-SITE EMPLOYEES EFFECTIVE APRIL 23, 1993. THE PERSONNEL AFFECTED INCLUDE JERRY JUDD, THE SITE SAFETY OFFICER; DONALD MILLS AND TERRY STEIN, THE MAINTENANCE PERSONNEL.

AR104364

III. FUTURE PLANS

A. OSC AWAITS OBLIGATION OF REMEDIAL MONIES TO CONDUCT ACTIONS TO REMOVE THE DRUMS FROM THE SITE.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A WEEKLY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING OBLIGATION OF REMEDIAL MONIES AND MOBILIZATION OF ERCS ON-SITE. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

**VINCE ZENONE, OSC
GEORGE ENGLISH, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.673**

AR104365

POLREP 674

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: MONTH ENDING 6/30/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ENGLISH ASSIGNED TO RELIEVE OSC ZENONE FOR FUTURE REMOVAL-LED ACTIVITIES ON-SITE. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES FOR DRUM REMOVAL PENDS STATE SIGNATURE TO SUPERFUND CONTRACT.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (6/30/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	193,256	195,000
EPA INDIRECT.....	334,989	340,000
TAT	2,062,339	2,100,000
ERCS(OHM) (04/07/92) ..	7,494,499	7,685,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,282,598	10,517,515

F. REMEDIAL COSTS TO (06/30/93)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM) ... (4/28/92)	3,141,564*	3,180,000
ERCS(EHRT) ... (1/22/92)	2,624,582*	2,728,840
ERCS (PENDING OBLIGATION)	---	2,500,000
TOTAL REMEDIAL COSTS..	6,701,438	9,398,840
G. TOTAL PROJECT COSTS..	16,941,591	19,916,355
H. TOTAL UNALLOCATED FUNDS.....		839,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135

TBD

AR104366

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 6/30/93

EPA.....	12,609
TAT.....	316,043

M. TOTAL ENFORCEMENT = \$459,801

N. ARCS PERSONNEL ON-SCENE ON A DAILY BASIS. TAT PERSONNEL ON-SCENE ON A WEEKLY AND AS NEEDED BASIS. EPA PERSONNEL ON-SCENE ON A PERIODIC BASIS.

II. ACTIONS TAKEN:

A. OSC ZENONE, OSC LAPSLEY, OSC ENGLISH, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS). RPM GROSS WAS ON-SITE 6/14/93-6/18/93 COORDINATING REMEDIAL AND ENFORCEMENT ACTIVITIES.

B. ON 6/16/93 OSC LAPSLEY, ORC WALTERS, RPM GROSS AND SECTION CHIEF HUMMEL CONDUCTED A SITE TOUR AT THE "GENERAL CHEMICALS" PLANT WITH REPRESENTATIVES FROM GENERAL CHEMICALS TO INSPECT THE GENERAL CONDITION, CHEMICALS PRESENTED, AND SAMPLING, REMOVAL OPTIONS FOR FUTURE CLEAN-UP ACTIVITIES. TAT ESCORTED THE TOUR.

C. ON 6/16/93 A PUBLIC MEETING WAS HELD AT 7:00 PM IN WARREN COUNTY COURT-HOUSE BY EPA. RPM GROSS, ORC WAYNE WALTERS, AND SECTION CHIEF HUMMEL FROM EPA ATTENDED. THE PURPOSE OF THE MEETING WAS TO DISCUSS THE UP-COMING REMEDIAL INVESTIGATION AND FEASIBILITY STUDY OF THE EXTENT OF THE CONTAMINATION AT THE AVTEX FIBERS SUPERFUND SITE.

D. ON 6/16/93 AT 8:00 AM A MEETING WAS HELD AMONG EPA, ARCS AND ERM TO DISCUSS EPA OVERSIGHT ACTIVITIES OF ERM'S SITE INVESTIGATION TASKS. TOPICS DISCUSSED INCLUDED PROJECT ORGANIZATION, SITE COMMUNICATIONS, SITE VISITATION AND DOCUMENTATION.

E. ON 6/16/93 AT 14:00 PM A MEETING WAS HELD AMONG ONSITE PARTIES, WARREN COUNTY ERC DERNER, AND ARCS TO REVIEW THE EMERGENCY RESPONSE SECTION OF THE HEALTH AND SAFETY PLAN. TOPICS DISCUSSED INCLUDED PERSONNEL ROLES AND LINES OF AUTHORITY, SITE COMMUNICATIONS, SITE SECURITY, HOSPITAL LOCATION, EMERGENCY EQUIPMENT STAGING AREAS, RALLY POINT LOCATIONS, WARREN COUNTY

AR104367

FIRE DEPARTMENT CAPABILITIES, AND SEISMIC ACTIVITY. 8 ON-SITE AND 4 OFF-SITE RALLY POINTS HAD BEEN IDENTIFIED BY ERM'S SSO AND ARCS KOEHLER AS COLLECTION POINTS FOR EVACUATED PERSONNEL IN CASE OF EMERGENCY.

F. ARCS PERSONNEL MOBILIZED TO SITE FOR RI/FS ACTIVITIES ON THE WEEK OF 6/14/93. ARCS SEWER TEAM BEGAN SEWER EXAMINATION ON 6/30/93.

G. ON 6/8/93-6/9/93 AND 6/29/93 ZARROLI & ASSOCIATES CONDUCTED SITE TOURS UNDER ESCORT OF ARCS KOEHLER. THE PURPOSE OF THE TOUR WAS TO LOCATE ASSETS NOT PREVIOUSLY FOUND, AND TO EXAMINE THEIR PROPOSED DECON PAD AREA.

H. ON 6/10/93, UNDER THE ESCORT OF ARCS/TAT, A GROUP OF 8 PEOPLE FROM THE WARREN COUNTY HEALTH DEPARTMENT AND ASTDR HAD AN ON-SITE TOUR THIS DATE. THE PURPOSE OF THIS TOUR WAS TO IDENTIFY AND VIEW AREAS OF THE PLANT THAT WERE ONCE FUNCTIONAL TO BETTER UNDERSTAND PAST WORKERS' EXPOSURE POTENTIAL.

I. TAT CONTINUE ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES. TAT CONTINUE WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE. TAT CONTINUE TO MONITOR LEAKING TANKS ON-SITE. TAT CONTINUE COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE. TAT BEGAN PERSONAL PROTECTION AND MONITORING EQUIPMENT PREPARATION FOR THE FORTHCOMING DRUM REMOVAL ACTIVITY.

J. FOR THE MONTH OF JUNE, AVTEX RECEIVED 4.6" OF RAINFALL. THE FREEBOARD READINGS AT THE WWTP SULFATE BASINS WERE ABOVE THE 2-FOOT LIMITS THIS MONTH. THE DISCHARGING RATE CONTINUED TO BE AT APPROXIMATELY 1000 GPM THIS MONTH, EXCEPT FOR 6/23/93 A 300 GPM DISCHARGING RATE WAS RECORDED. THE PLANT WAS TEMPORARILY SHUT DOWN FOR SECONDARY CLARIFIER REPAIR WORK ON 6/8/93. ERM BEGAN REMEDIATION INVESTIGATION ACTIVITIES ON-SITE ON 6/14/93. THE SURVEYING ACTIVITY WOULD CONTINUE FOR 3-4 WEEKS. THE SEISMIC STUDY CONDUCTED BY ERM BEGAN 6/24/93 AND WOULD LAST FOR 4 WEEKS.

K. DURING THE WEEKLY RECON OF THE STAGED DRUMS, TAT MONITORED AND REPORTED LEAKING DRUMS, ESPECIALLY IN SHIPPING #1 AND #5 AREAS.

L. ON 6/2/93 THE OFFICE OF WEIGHTS & MEASURES, VIRGINIA DEPT. OF AGRICULTURE & CONSUMER SERVICES, INSPECTED, CORRECTED AND RE-CERTIFIED THE AVTEX VEHICLE SCALE. THIS SCALE IS FOR SCALING GROSS WEIGHT OF TRUCKS LESS THAN 80,000 POUNDS.

AR104368

M. ON 6/23/93 ARCS/TAT CONDUCTED A SITE TOUR FOR TRANSFORMER INSPECTIONS. TRANSFORMERS INSPECTED (SUBSTATIONS #2, #4A, #4B, #4C, & #14) APPEARED TO BE IN STABLE CONDITION.

III. FUTURE PLANS

A. OSC AWAITS OBLIGATION OF REMEDIAL MONIES TO CONDUCT ACTIONS TO REMOVE THE DRUMS FROM THE SITE.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A WEEKLY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING OBLIGATION OF REMEDIAL MONIES AND MOBILIZATION OF ERCS. ON-SITE. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

VINCE ZENONE, OSC
GEORGE ENGLISH, OSC
USEPA REGION III
PHILADELPHIA, PA.

AR104369

POLREP 675

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING 7/17/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ENGLISH ASSIGNED TO RELIEVE OSC ZENONE FOR FUTURE REMOVAL-LED ACTIVITIES ON-SITE. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES FOR DRUM REMOVAL PENDS STATE SIGNATURE TO SUPERFUND CONTRACT.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (7/16/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	193,256	195,000
EPA INDIRECT.....	334,989	340,000
TAT	2,069,997	2,100,000
ERCS(OHM) ..(04/07/92) ..	7,494,499	7,685,000
ERCS(ETI) ..(07/14/93) ..	8,427	100,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,298,693	10,617,515

F. REMEDIAL COSTS TO (07/16/93)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM) ... (4/28/92) ..	3,141,564*	3,180,000
ERCS(EHRT) .. (1/22/92) ..	2,624,582*	2,728,840
ERCS (PENDING OBLIGATION) --- *		2,500,000
TOTAL REMEDIAL COSTS. .	6,701,438	9,398,840
G. TOTAL PROJECT COSTS..	17,000,131	20,016,355
H. TOTAL UNALLOCATED FUNDS.....		739,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135

TBD

AR104370

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 7/16/93

EPA.....	12,609
TAT.....	322,676

M. TOTAL ENFORCEMENT = \$466,434

N. ARCS PERSONNEL ON-SCENE ON A DAILY BASIS. TAT PERSONNEL ON-SCENE ON A WEEKLY AND AS NEEDED BASIS. EPA PERSONNEL ON-SCENE ON A PERIODIC BASIS.

II. ACTIONS TAKEN:

A. OSC ENGLISH, OSC ZENONE, OSC LAPSLEY, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. ON 6/4/93 A NOTICE OF POTENTIAL LIABILITY AND OFFER TO NEGOTIATE FOR THE FOLLOWING REMOVAL ACTION WAS SENT FROM EPA REGION III TO THE AVTEX TRUSTEE FOR PROMPT REPLY:

1. ANALYSIS OF CONTENTS OF TANKS LOCATED OUTSIDE OF BUILDINGS ON-SITE WHICH ARE BELIEVED TO CONTAIN CAUSTIC SODA, SULFURIC ACID, FUEL OIL, ZINC SLUDGE AND/OR ETHYLENE GLYCOL;
2. DETERMINATION OF AN APPROPRIATE REMOVAL ACTION INCLUDING OFF-SITE DISPOSAL AND/OR ON-SITE TREATMENT; AND
3. IMPLEMENTATION OF THE APPROPRIATE REMOVAL ACTION.

EPA WILL PERFORM THE ABOVE ACTIVITIES IF TRUSTEE DECLINES INVOLVEMENT IN PERFORMING THE RESPONSE ACTIVITIES OR NOT RESPOND IN 21 DAYS.

C. THE SAMPLING ACTIVITY FOR THESE 17 TANKS WAS CONDUCTED BY EPA ERCS CONTRACTOR ETI DURING THE WEEK OF 7/12/93 - 7/16/93. OSC ENGLISH WAS ON-SITE 7/12/93 - 7/15/93 COORDINATING THE SAMPLING AS PART OF THE REMOVAL EFFORT. ERCS CONTRACTOR ETI PERSONNEL WERE ON-SITE 7/12/93 - 7/16/93 FOR CONDUCTING THE SAMPLING. TATMS WERE ON-SITE 7/12/93 - 7/15/93 CONDUCTING THE OVERSIGHT OF THE ACTIVITY.

AR104371

D. ERCS ETI PERSONNEL (5 MEN) MOBILIZED TO SITE AT 11:30 AM OF 7/12/93. A BRIEFING OF ANTICIPATED WORK ACTIVITIES WAS CONDUCTED AMONG EPA OSC ENGLISH, ETI TEAM MEMBERS (5 MEN), AND TATMS HOU & SCHUESSLER AT 12:00 PM. ISSUES DISCUSSED INCLUDE A SITE-SPECIFIC SAFETY PLAN FROM ETI, A SCHEDULE SET-UP TO BE ANNOUNCED AT THE DAILY 9:00 AM SITE MEETING FOR POSSIBLE ROAD BLOCK DURING THE SAMPLING, USING MAN-LIFT FOR SAMPLE COLLECTION, AND OTHER SAFETY ISSUES.

E. 7/12/93: ETI CREW MEMBERS SET UP OF DECON/SHOWER FACILITIES, ARRANGED FOR RENTAL MAN-LIFT TO BE USED FOR SAMPLING ACTIVITY, AND PREPARED A SITE SAFETY PLAN ADDRESSING ISSUES RELATED TO THE SITE-SPECIFIC ACTIONS.

7/13/93: THE RENTAL MAN-LIFT ARRIVED ON-SITE 11:25 AM. ETI CREW MEMBERS DRESSED OUT IN LEVEL C WITH SARANEX (WITH HOOD), BOOTIES AND GLOVES TAPED UP. TWO 1-QUART JARS OF SAMPLE WERE TAKEN FROM EACH TANK. SAMPLES WERE COLLECTED FROM THE TOP OPEN HATCH OF EACH TANK. BEFORE THE MANLIFT ARRIVED, THE CREW ACCESSED THE TOP OF THE TANKS USING EXISTING LADDERS AFFIXED TO TANKS; AFTERWARDS, THE MAN-LIFT WAS USED BY THE CREW TO ACCESS THE TOP OF THE TANKS. SAMPLES WERE COLLECTED FROM 7 FUEL OIL TANKS (TANK #10-#16) AT THE TANK FARM NEAR THE POLY DOCK AREA THIS DATE. NO ELEVATED READINGS WERE RECORDED DOWNWIND BY TAT USING H2S METER.

7/14/93: CREW COLLECTED SAMPLES FROM 3 FUEL TANKS (TANK #7-#9) AT THE SOUTH OF THE PLANT AND 3 CAUSTIC SODA TANKS (TANK #1-#3) NEAR THE SODA DISSOLVING BUILDING. CREW DRESSED OUT LEVEL C. NO ELEVATED READINGS WERE RECORDED DOWNWIND BY TAT USING H2S METER AND OVA.

7/15/93: CREW COLLECTED SAMPLES FROM ZINC SLUDGE TANK (TANK #17), CAUSTIC SODA TANKS (TANK #4-#5), AND SULFURIC ACID TANK (#6). ETI ARRANGED BIDS FOR LABORATORY TO ANALYZE THE COLLECTED SAMPLES.

7/16/93: 11 SAMPLES WERE SENT OUT TO LABORATORY RESOURCES AT TETERBORO, NJ, FOR ANALYSIS. (SAMPLES FROM THE 5 CAUSTIC SODA TANKS WERE NOT SENT OUT BECAUSE FMC/ERM WAS TO TAKE THE CONTENT OF THESE 5 TANKS FOR WWTP USE BASED ON THEIR OWN SAMPLE RESULT OBTAINED THE PREVIOUS WEEK.) THE ANALYSIS INCLUDES VOLATILE ORGANICS, SEMIVOLATILES, PESTICIDES/PCBS, TAL METALS, TOTAL SULFIDE, REACTIVITY, pH, IGNITABILITY, PERCENT SOLIDS, PERCENT WATER, TOC, TOX, AND BTU. ETI DEMOBILIZED CREW MEMBERS AND EQUIPMENTS THIS DATE.

AR104372

E. DURING THE ENTIRE PROCESS, TAT OBSERVED AND DOCUMENTED CONTRACTOR'S (ETI) ACTIVITIES, MONITORED DOWNWIND AMBIENT AIR FOR DOCUMENTATION OF ANY POTENTIAL RELEASES, AND INFORMED OSC OF ANY APPARENT PROBLEMS. TAT OBSERVED THAT ETI SAMPLING ACTIVITIES PROCEEDED WITHOUT PROBLEMS. ETI PERSONNEL INFORMED TAT THAT THE LEVEL OF THE CONTENT OF THE TANKS WAS VERY CLOSE TO THE LEVEL INDICATED ON THE OUTSIDE OF THE TANKS BY BLUE PAINT MARKS. NO ELEVATED READINGS FROM THE OVA AND H2S METER WERE RECORDED.

F. ERM USINOWICZ MET WITH OSC ENGLISH ON 7/15/93 ON-SITE. USINOWICZ EXPRESSED FMC/ERM'S INTEREST IN USING THE CONTENT IN THE 5 CAUSTIC SODA TANKS FOR ON-SITE WWTP OPERATION USE, AND DISCUSSED WITH OSC ON RELEVANT ISSUES.

III. FUTURE PLANS

A. OSC AWAITS OBLIGATION OF REMEDIAL MONIES TO CONDUCT ACTIONS TO REMOVE THE DRUMS FROM THE SITE.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A WEEKLY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING OBLIGATION OF REMEDIAL MONIES AND MOBILIZATION OF ERCS ON-SITE. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

GEORGE ENGLISH, OSC
VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.

AR104373

POLREP 676

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: MONTH ENDING 7/31/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES FOR DRUM REMOVAL ARE ANTICIPATED TO BEGIN THE WEEK OF 8/16/93.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (7/31/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	193,256	195,000
EPA INDIRECT.....	334,989	340,000
TAT	2,080,652	2,100,000
ERCS(OHM) ..(04/07/92) ..	7,494,499	7,685,000
ERCS(ETI) ..(07/31/93) ..	30,232	100,000
USCG(10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS..	10,331,143	10,617,515

F. REMEDIAL COSTS TO (07/31/93)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	740,000
ERCS(OHM) ... (4/28/92) ..	3,141,564*	3,180,000
ERCS(EHRT) .. (1/22/92) ..	2,624,582*	2,728,840
ERCS (PENDING OBLIGATION) --- *		2,500,000
TOTAL REMEDIAL COSTS. ..	6,701,438	9,398,840
G. TOTAL PROJECT COSTS..	17,000,131	20,016,355
H. TOTAL UNALLOCATED FUNDS.....		739,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

AR104374

L. ENFORCEMENT (106) COSTS 02/05/92 - 7/31/93

EPA.....	12,609
TAT.....	325,423

M. TOTAL ENFORCEMENT = \$469,181

N. ARCS PERSONNEL ON-SCENE ON A DAILY BASIS. TAT PERSONNEL ON-SCENE ON A WEEKLY AND AS NEEDED BASIS. EPA PERSONNEL ON-SCENE ON A PERIODIC BASIS.

II. ACTIONS TAKEN:

A. OSC ENGLISH, OSC ZENONE, OSC LAPSLEY, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. RPM GROSS WAS ON-SITE COORDINATING REMEDIAL AND ENFORCEMENT ACTIVITIES ON 7/20/93 - 7/22/93.

C. EPA ERCS CONTRACTOR ETI ON-SITE CONDUCTED TANK SAMPLING ACTIVITY DURING THE WEEK OF 7/12/93 - 7/16/93. OSC ENGLISH WAS ON-SITE 7/12/93 - 7/15/93 COORDINATING THE SAMPLING AS PART OF THE REMOVAL EFFORT. TATMS WERE ON-SITE 7/12/93 - 7/15/93 CONDUCTING THE OVERSIGHT OF THE ACTIVITY. (SEE POLREP.675 FOR DETAILS)

D. ON 7/16/93 11 SAMPLES WERE SENT OUT TO LABORATORY RESOURCES AT TETERBORO, NJ, FOR ANALYSES. THE SAMPLING RESULTS ARE EXPECTED TO BE RECEIVED ON 8/9/93. ETI DEMOBILIZED CREW MEMBERS AND EQUIPMENT ON 07/16/93.

E. TAT CONTINUED ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES. TAT CONTINUED WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE. TAT CONTINUED TO MONITOR LEAKING TANKS ON-SITE. TAT CONTINUED COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE. TAT BEGAN PERSONAL PROTECTION AND MONITORING EQUIPMENT PREPARATION FOR THE FORTHCOMING DRUM REMOVAL ACTIVITY. TAT OBSERVED AND DOCUMENTED CONTRACTOR'S (ETI) ACTIVITIES, MONITORED DOWNWIND AMBIENT AIR FOR DOCUMENTATION OF ANY POTENTIAL RELEASES DURING THE TANK SAMPLING ACTIVITY 7/12/93-7/15/93.

F. ERM USINOWICZ MET WITH OSC ENGLISH ON 7/15/93 ON-SITE DISCUSSING RELEVANT ISSUES ON UTILIZING CONTENT OF ON-SITE SODA TANKS.

AR104375

G. ARCS KOEHLER REPORTED TO OSC ENGLISH ON 7/27/93 THAT #1 SODA TANK WAS LEAKING AT A RATE OF APPROXIMATELY 20 GPM DISCOVERED BY ERM AT APPROXIMATELY 8:00 AM THAT DAY. OSC ENGLISH MOBILIZED THE ERCS PERSONNEL ON-SITE THE SAME DAY FOR TANK REPAIR. ETI PERSONNEL (3 MEN) WERE ON-SITE 12:30 PM. THE ORIGINAL PLAN WAS TO PUMP THE CONTENTS IN TANK #1 INTO TANK #2. ON 7/28/93 DUE TO THE INTERCONNECTION OF TANK #1 AND #2 THE TRANSFER OF CONTENTS FROM #1 TO #2 WAS NOT SUCCESSFUL. AFTER DISCUSSING WITH OSC ENGLISH VIA TELECOM, ETI PLACED A SEMI-PERMANENT PATCH OVER TANK #1'S EXISTING BREACH POINT WITH A RUBBER PLUG AND SEALED IT WITH AN EPOXY RESIN ON 7/29/93 PENDING FURTHER ACTION.

H. DURING THE MONTH OF JULY FRONT ROYAL RECEIVED 1.8" OF RAINFALL. DUE TO THE DRILLING ACTIVITY GOING ON AT THE BASIN AREA, WWTP WAS OPERATING AT A LOW DISCHARGING RATE 500-900 GPM THIS MONTH. ERM TOOK A SAMPLE FROM SODA TANK #1 ON 7/8/93 FOR POSSIBLE USAGE OF THE CONTENTS FOR WWTP OPERATION.

I. DURING THE MONTH OF JULY A FEW HEALTH AND SAFETY INCIDENTS WERE REPORTED UPON ERM AND GF RI/FS ON-SITE ACTIVITIES: ON 7/7/93 JANE WILLIAMS OF ERM HAD HEAT-RELATED SYMPTOMS AT THE WWTP LAB AREA; ON 7/8/93 SCOTT McQUOWN OF ERM WAS BITTEN BY AN INSECT OR ARACHNID ALONG EASTERN PROPERTY BOUNDARY OF AVTEX; ON 7/19/93 DANNIEL JOACHIM OF ERM HAD PUNCTURE WOUND AT DECONTAMINATION PAD, WWTP; ON 7/28/93 BOBBY BUSH OF GF WAS BURNED BY 50% SOLUTION OF NAOH WHILE WORKING IN MANHOLE D-6. PROPER ACTIONS WERE TAKEN AFTER THE INCIDENTS.

J. ON 7/15/93 EHRT INFORMED AVTEX ARCS ON-SITE REPRESENTATIVE KOEHLER THAT AN EHRT ON-SITE WHITE VAN WAS TO BE RELEASED TO A PURCHASER Mr. THARPE AND WOULD BE REMOVED FROM SITE.

K. ON 7/16/93 ASSETS PURCHASED BY LINDEN BEVERAGE COMPANY FROM TRUSTEE WERE REMOVED OFF-SITE. ARCS KOEHLER PROVIDED OVERSIGHT DURING THE REMOVAL. Z & A'S CLIENT TEXTILE EQUIPMENT, INC. WERE ON-SITE 7/16/93 EXAMINING SELECTED ASSETS AT THE PHYSICAL TESTING LAB FOR POSSIBLE PURCHASING. ARCS KOEHLER ESCORTED THE TOUR.

AR104376

III. FUTURE PLANS

A. OSC AWAITS OBLIGATION OF REMEDIAL MONIES TO CONDUCT ACTIONS TO REMOVE THE DRUMS FROM THE SITE.

B. TAT TO CONTINUE TO MONITOR SITE ACTIVITIES ON A WEEKLY BASIS. TAT TO RECON DRUM STAGING AREAS PENDING OBLIGATION OF REMEDIAL MONIES AND MOBILIZATION OF ERCS ON-SITE. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING.

C. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED BIMONTHLY OR MONTHLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

GEORGE ENGLISH, OSC
VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.676

AR104377

Subject: FRONT ROYAL AVTEX FIBERS POLREP.677

POLREP 677

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: 1730 HOURS THURSDAY 8/18/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES FOR DRUM REMOVAL BEGAN THE WEEK OF 8/16/93.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (7/31/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.....	193,256	205,000
EPA INDIRECT.....	334,989	355,000
TAT .(8/13/93).....	2,086,034	2,150,000
ERCS(OHM).(04/07/92).	7,494,499	7,685,000
ERCS(ETI).(07/31/93).	30,232	100,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,331,143	10,692,515

F. REMEDIAL COSTS TO (04/29/92)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....	715,200*	790,000
ERCS(OHM)...(4/28/92)	3,141,564*	3,180,000
ERCS(EHRT)..(1/22/92)	2,624,582*	2,728,840
ERCS (ETI)..(8/17/93)	8,079*	3,000,000
TOTAL REMEDIAL COSTS.	6,701,438	9,948,840
G. TOTAL PROJECT COSTS..	17,000,131	20,641,355
H. TOTAL UNALLOCATED FUNDS.....		114,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 648,135 TBD

AR104378

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93

EPA.....(12/10/93)	12,609
TAT.....	329,167

M. TOTAL ENFORCEMENT = \$469,181

N. PERSONNEL ON-SCENE	EPA.....03
	ERCS (ETI).....09
	TAT.....03

II. ACTIONS TAKEN:

A. OSC ENGLISH, OSC ZENONE, OSC LAPSLEY, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. OSC ENGLISH ARRIVED ON-SITE ON 8/16/93 COORDINATING EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES. SECTION CHIEF G. CRYSTAL WAS ON-SITE 8/18/93-8/19/93 FOR SITE PREPARATION OF THE DRUM ACTIVITY. FAS L. MARZULLI WAS ON-SITE 8/18/93-8/19/93 ASSISTING OSC TRACK COSTS AND PROVIDE ADMINISTRATIVE SUPPORT. OSC ENGLISH, SECTION CHIEF CRYSTAL, AND FAS MARZULLI WORKED ON RAISING TAT AND EPA REMOVAL AND REMEDIAL CEILINGS FOR THE FORTHCOMING DRUM ACTIVITIES ON 8/18/93.

C. ON 8/16/93 EPA OSC ENGLISH, ERCS ETI REPRESENTATIVE GALLIATO, AND TATMS MET AND DISCUSSED THE WORK SCHEDULE. OSC ENGLISH INFORMED TAT TO BEGIN A DAILY OR BI-WEEKLY POLREP DURING THE DRUM ACTIVITY. OSC REQUESTED THAT TAT PREPARE AN ADDENDUM TO THE SITE SAFETY PLAN TO INCLUDE THE DRUM REMOVAL ACTIVITY. OSC ENGLISH ALSO REQUESTED THAT AN ON-SITE MEETING BETWEEN ETI AND TAT BE HELD EACH DAY BEFORE AND AFTER WORK TO DISCUSS DAILY WORK PLAN AND HEALTH & SAFETY CONCERNS.

AR104379

D. TAT MOBILIZED ON-SITE ON 8/16/93 TO PROVIDE OVERSIGHT OF THE ERCS SAMPLING, HAZCATING, AND REMOVAL OF ALL THE STAGED DRUMS. ON 8/16/93 TAT WORKED ON AN ADDENDUM OF SITE SAFETY PLAN TO INCLUDE THE DRUM OVERSIGHT ACTIVITY. TAT CONDUCTED MONITORING AND DOCUMENTATION OF CONTRACTOR'S (ETI) ACTIVITIES FOR HEALTH AND SAFETY ISSUES AND POTENTIAL RELEASES. TAT CONTINUED ENFORCEMENT OVERSIGHT MONITORING OF WWTP ACTIVITIES. TAT CONTINUED COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE.

E. ETI BEGAN PERSONNEL AND EQUIPMENT MOBILIZATION, AND TRAILER AND TELECOM LINE SET-UP ON 8/10/93 - 8/13/93 FOR PREPARATION OF THE DRUM SAMPLING, HAZCATING, AND T&D ACTIVITIES. ETI CREW CONTINUED TO MOBILIZE ON-SITE ON 8/16/93. ETI SITE SAFETY OFFICER CAIRNS COMPLETED AN ADDENDUM OF SITE SAFETY PLAN FOR TAT TO REVIEW ON 8/17/93. ON 8/17/93 TAT MILLER ESCORTED ETI CREW FOR AN ON-SITE TOUR TO INSPECT ALL THE DRUM STAGING AREAS. AN ADDITION OF APPROXIMATELY 100 DRUMS WERE FOUND DURING THE INSPECTION IN A ROOM LOCATED BETWEEN THE ENGINEERING SHOP AND THE STORE ROOM. WHETHER THESE DRUMS WILL BE SAMPLED IS TO BE DECIDED AFTER DISCUSSING WITH OSC ENGLISH. ETI CONTINUED SITE PREPARATION WORKING ON BUILDING STAIRS, SETTING UP DECON AREA ON 8/17/93 - 8/18/93.

III. FUTURE PLANS

A. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. TAT TO CONTINUE TO MONITOR THE ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING THE DRUM REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING.

C. POLREPS TO CONTINUE TO BE DISTRIBUTED DAILY OR BI-WEEKLY DURING THE DRUM REMOVAL PERIOD.

GEORGE ENGLISH, OSC
VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.677

AR104380

POLREP 678

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: 1300 HOURS SATURDAY 8/21/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH DRUM REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (8/21/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT(12/10/92).	193,256	205,000
EPA INDIRECT(12/10/92)	334,989	355,000
TAT	2,087,604	2,150,000
ERCS(OHM) ..(04/07/92) ..	7,494,499	7,685,000
ERCS(ETI) ..(07/31/93) ..	30,232	100,000
USCG(10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS..	10,338,095	10,692,515

F. REMEDIAL COSTS TO (04/29/92)

	ESTIMATED:	CEILING:
EPA DIRECT.....	88,224	100,000
EPA INDIRECT.....	131,768	150,000
TAT.....(8/21/93)	732,346*	790,000
ERCS(OHM) ... (4/28/92)	3,141,564*	3,180,000
ERCS(EHRT) ..(1/22/92)	2,624,582*	2,728,840
ERCS (ETI) ..(8/21/93)	21,603*	3,000,000
TOTAL REMEDIAL COSTS.	6,740,087	9,948,840

G. TOTAL PROJECT COSTS.. 17,000,131 20,641,355

H. TOTAL UNALLOCATED FUNDS..... 114,620

I. TOTAL PROJECT CEILING..... 20,755,975

J. * 10% STATE SHARE.... 652,010 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

AR104381

L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93

EPA.....(12/10/92)	12,609
TAT.....	329,167

M. TOTAL ENFORCEMENT = \$469,181

N. PERSONNEL ON-SCENE	EPA.....03
	ERCS (ETI).....09
	TAT.....03

II. ACTIONS TAKEN:

A. OSC ENGLISH WAS ON-SITE 8/16/93 - 8/21/93 COORDINATING EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES. SECTION CHIEF G. CRYSTAL WAS ON-SITE 8/18/93 - 8/19/93 FOR SITE PREPARATION OF THE DRUM ACTIVITY. FAS L. MARZULLI WAS ON-SITE 8/18/93 - 8/19/93 ASSISTING OSC TRACK COSTS AND PROVIDE ADMINISTRATIVE SUPPORT. OSC ZENONE, OSC LAPSLEY, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. ON 8/21/93 OSC ENGLISH REQUESTED TAT TO PREPARE A LIST OF DRUM CONTAINING PRODUCTS WITH THE PRODUCT INFORMATION FROM THE LABELS ON THE DRUMS. OSC ALSO TASKED TAT TO REVIEW THE ANALYTICAL RESULTS OF TANK SAMPLING DONE ON 7/15/93 BY ETI FOR RECOMMENDATIONS OF DISPOSAL METHODS, AND TASKED TAT TO FIND OUT IF THE CONTENT IN THE ZINC SLUDGE TANK CAN BE DISPOSED OF IN THE SULFATE BASINS TO REDUCE THE DISPOSAL COST.

C. TAT CONDUCTED WWTP WEEKLY RECON ON 8/19/93. THE WWTP WAS SHUT DOWN ON 8/18/93 AND PART OF THE MORNING ON 8/19/93. THE OPERATION WAS BACK TO NORMAL AROUND NOON OF 8/19/93. TAT REVIEWED ETI'S AMENDMENTS TO SITE SAFETY PLAN ON 8/19/93. TAT MONITORED THE AMBIENT AIR AT THE BREATHING ZONE OF ERCS WORKING AREA, SHIPPING #1. NO ELEVATED READINGS WERE RECORDED. TAT CONTINUED COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE.

D. ETI SITE SAFETY OFFICER CAIRNS COMPLETED AN ADDENDUM OF SITE SAFETY PLAN WITH A GENERAL SAMPLING PLAN ATTACHED FOR TAT TO REVIEW ON 8/20/93. ETI CREW WORKED ON RE-GROUPING, AND NUMBERING THE STAGED DRUMS IN SHIPPING #1 AREA ON 8/19/93 - 8/21/93. ETI HANDED IN A COPY OF THE ANALYTICAL RESULTS OF THE TANK SAMPLES, COLLECTED ON 7/15/93, TO TAT ON 8/21/93.

AR104382

III. FUTURE PLANS

A. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. TAT TO CONTINUE TO MONITOR THE ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING THE DRUM REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING.

C. POLREPS TO CONTINUE TO BE DISTRIBUTED DAILY OR BI-WEEKLY DURING THE DRUM REMOVAL PERIOD.

GEORGE ENGLISH, OSC
VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.678

AR104383

POLREP 679

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: 1210 HOURS SATURDAY 8/28/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH DRUM SAMPLING AND REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (8/28/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT(8/19/93).	199,982	205,000
EPA INDIRECT(8/19/92)	346,003	355,000
TAT(8/17/93)	2,087,604	2,150,000
ERCS(OHM) ..(04/07/92) ..	7,494,499	7,685,000
ERCS(ETI) ..(07/31/93) ..	30,232	100,000
USCG(10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS..	10,355,835	10,692,515

F. REMEDIAL COSTS TO (08/28/93)

	ESTIMATED:	CEILING:
EPA DIRECT.....	93,158	100,000
EPA INDIRECT.....	140,856	150,000
TAT.....	749,536*	790,000
ERCS(OHM) ... (4/28/92)	3,141,564*	3,180,000
ERCS(EHRT) .. (1/22/92)	2,624,582*	2,728,840
ERCS (ETI) .. (8/28/93)	62,664*	3,000,000
TOTAL REMEDIAL COSTS.	6,812,360	9,948,840
G. TOTAL PROJECT COSTS..	17,168,195	20,641,355
H. TOTAL UNALLOCATED FUNDS.....		114,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 657,835 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

AR104384

L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93

EPA.....(12/10/92)	12,609
TAT.....	329,167

M. TOTAL ENFORCEMENT = \$469,181

N. PERSONNEL ON-SCENE	EPA.....01
	ERCS (ETI).....09
	TAT.....03

II. ACTIONS TAKEN:

A. OSC ENGLISH WAS ON-SITE 8/23/93 - 8/27/93 COORDINATING EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES. OSC ZENONE, OSC LAPSLEY, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. AS TASKED BY OSC ENGLISH ON 8/21/93, TAT BEGAN THIS WEEK VIRGIN-DRUM INVENTORY FOR PREPARATION OF A LIST OF DRUMS CONTAINING PRODUCT WITH THE INFORMATION FROM THE LABELS ON THE DRUMS. ALSO TASKED BY OSC, TAT REVIEWED THE ANALYTICAL RESULTS OF TANK SAMPLING, DONE ON 7/15/93 BY ETI, WITH RECOMMENDATION OF DISPOSAL METHODS, AND SUBMITTED THE COMMENTS TO OSC ON 8/27/93.

C. ETI CREW COLLECTED A TOTAL OF 211 DRUM CONTENT SAMPLES AND 21 DUPLICATE QA/QC SAMPLES, INCLUDING A TOTAL OF 17 PCB SAMPLES AND 3 PCB-QA/QC SAMPLES, FOR HAZCATING THIS WEEK. UP TO DATE ETI'S LAB PERFORMED HAZCAT ANALYSES OF 130 DRUM CONTENT SAMPLES AND 12 DUPLICATE SAMPLES. ETI SUBMITTED TO EPA AND PROVIDED TAT A COPY OF REVISED SAMPLING WROK PLAN ON 8/25/93.

D. TAT CONTINUED MONITORING THE AMBIENT AIR AT THE BREATHING ZONE OF ERCS WORKING AREA, SHIPPING #1 AND #5. NO ELEVATED READINGS WERE RECORDED. ON 8/20/93 TAT REQUESTED ETI TO REVISE THE SAMPLING WORK PLAN AND PROVIDE A COPY OF IT TO EPA AND TAT. TAT CONDUCTED WWTP WEEKLY RECON ON 8/26/93. THE FREEBOARD READINGS OF SULFATE BASINS WERE ABOVE 2 FEET. WWTP OPERATED NORMALLY THIS WEEK. TAT CONTINUED COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE.

AR104385

III. FUTURE PLANS

A. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. TAT TO CONTINUE TO MONITOR THE ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING THE DRUM REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING.

C. POLREPS TO CONTINUE TO BE DISTRIBUTED DAILY OR BI-WEEKLY DURING THE DRUM REMOVAL PERIOD.

**GEORGE ENGLISH, OSC
VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.679**

AR104386

POLREP 680
AVTEX FIBERS FRONT ROYAL
FRONT ROYAL, WARREN COUNTY, VA.
CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION
ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN
CC:BONNIE GROSS (3HW24)
WAYNE WALTERS (3RC21)

I. SITUATION: 1800 HOURS FRIDAY 09/03/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE--LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH DRUM SAMPLING AND REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (09/03/93) UNLESS SHOWN OTHERWISE:

	ESTIMATED:	CEILING:
EPA DIRECT(8/30/93)..	200,421	205,000
EPA INDIRECT(8/30/92)	346,803	355,000
TAT	2,087,801	2,150,000
ERCS(OHM) .. (04/07/92) ..	7,494,499	7,685,000
ERCS(ETI) .. (07/31/93) ..	30,232	100,000
USCG(10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS..	10,357,271	10,692,515

F. REMEDIAL COSTS TO (09/03/93)

	ESTIMATED:	CEILING:
EPA DIRECT.....	94,906	100,000
EPA INDIRECT.....	143,768	150,000
TAT.....	775,139*	790,000
ERCS(OHM) ... (4/28/92)	3,141,564*	3,180,000
ERCS(EHRT) .. (1/22/92)	2,624,582*	2,728,840
ERCS (ETI)	93,805*	3,000,000
TOTAL REMEDIAL COSTS..	6,873,778	9,948,840

G. TOTAL PROJECT COSTS.. 17,231,049 20,641,355

H. TOTAL UNALLOCATED FUNDS..... 114,620

I. TOTAL PROJECT CEILING..... 20,755,975

J. * 10% STATE SHARE.... 663,509 TBD

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST

AR104387

THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93

EPA.....(12/10/92)	12,609
TAT.....	329,167

M. TOTAL ENFORCEMENT = \$469,181

N. PERSONNEL ON-SCENE:	EPA.....02
	ERCS (ETI).....09
	TAT.....03

II. ACTIONS TAKEN:

A. OSC ZENONE WAS ON-SITE 8/30/93 - 9/02/93 COORDINATING EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES. OSC ENGLISH, OSC LAPSLEY, RPM GROSS AND ORC WALTERS CONTINUED COORDINATION OF REMOVAL, REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS). FAS L. MARZULLI WAS ON-SITE 8/30/93 - 8/31/93 ASSISTING OSC TRACKING COSTS AND PROVIDING ADMINISTRATIVE SUPPORT. OSC ZENONE REVIEWED AND COMMENTED ON THE DRAFT OF THE OSC REPORT FOR AVTEX REMOVAL ACTION WHICH TAT PREPARED FOR OSC.

B. ETI CREW CONTINUED SAMPLING AND HAZCATING DRUMS AT SHIPPING #1 STORAGE AREA. TO THE END OF THIS WEEK CREW COLLECTED A TOTAL OF 507 DRUM CONTENT SAMPLES AND 50 DUPLICATE QA/QC SAMPLES, INCLUDING A TOTAL OF 17 PCB SAMPLES AND 3 PCB-QA/QC SAMPLES. UP TO DATE ETI'S LAB PERFORMED HAZCAT ANALYSES OF 368 DRUM CONTENT SAMPLES AND 29 DUPLICATE QA/QC SAMPLES. NO WORK TO BE CONDUCTED DURING THE LABOR-DAY LONG WEEKEND. SAMPLING WILL BE RESUMED AT 10:00 AM ON 9/7/93.

C. TAT CONTINUED MONITORING THE AMBIENT AIR AT THE BREATHING ZONE OF ERCS WORKING AREA, SHIPPING #1, DURING ETI DRUM SAMPLING ACTIVITY. NO ELEVATED READINGS WERE RECORDED. TAT RECEIVED A REVISED COPY OF ETI'S DRUM SAMPLING PLAN ON 8/30/93. TAT CONTINUED VIRGIN-DRUM INVENTORY OF DRUMS CONTAINING PRODUCT WITH THE INFORMATION FROM THE LABELS ON THE DRUMS IN SHIPPING #5 AREA. TAT PROVIDED A PARTIAL LIST OF THE VIRGIN DRUMS TO OSC ON 9/2/93. TAT CONDUCTED WWTP WEEKLY RECON ON 9/2/93. THE FREEBOARD READINGS OF SULFATE BASINS WERE ABOVE 2 FEET. WWTP OPERATED NORMALLY THIS WEEK. TAT CONTINUED UPDATING AND REVISING THE DRAFTS OF THE OSC REPORT AND THE CHRONOLOGY/DATA PACKAGEMODULE.

AR104388

III. FUTURE PLANS

A. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. TAT TO CONTINUE TO MONITOR THE ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING THE DRUM REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO THE OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING.

C. POLREPS TO CONTINUE TO BE DISTRIBUTED DAILY OR BI-WEEKLY DURING THE DRUM REMOVAL PERIOD.

**GEORGE ENGLISH, OSC
VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.680**

AR104389

POLREP 681

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING 9/11/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH DRUM SAMPLING AND REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (9/11/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.(8/30/93)..	200,561	205,000
EPA INDIRECT(8/30/93)	347,059	355,000
TAT	2,087,801	2,150,000
ERCS(OHM).(04/07/92)..	7,494,499	7,685,000
ERCS(ETI).(07/16/93)..	30,232	100,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,357,667	10,692,515

F. REMEDIAL COSTS TO (09/11/93)

	ESTIMATED:	CEILING:
EPA DIRECT.....	94,906	100,000
EPA INDIRECT.....	143,768	150,000
TAT.....	790,702*	790,000
ERCS(OHM)...(4/28/92)	3,141,564*	3,180,000
ERCS(EHRT)...(1/22/92)	2,624,582*	2,728,840
ERCS(ETI)	120,972*	3,000,000
TOTAL REMEDIAL COSTS.	6,916,494	9,948,840
G. TOTAL PROJECT COSTS..	17,274,161	20,641,355
H. TOTAL UNALLOCATED FUNDS.....		114,620
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 667,782 TBD

AR104390

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93

EPA.....	12,609
TAT.....	329,167

M. TOTAL ENFORCEMENT = \$472,925

N. PERSONNEL ON-SCENE	EPA.....00
	ERCS(ETI)....09
	TAT.....03

II. ACTIONS TAKEN:

A. OSC ZENONE COORDINATED THE EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES FROM REGIONAL OFFICE. OSC LAPSLEY, RPM GROSS, AND ORC WALTERS CONTINUED COORDINATION OF REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. ETI CREW CONTINUED SAMPLING AND HAZCATING DRUMS IN SHIPPING NO.1 AREA. TO THE END OF THIS WEEK CREW COLLECTED A TOTAL OF 738 DRUM CONTENT SAMPLES AND 73 DUPLICATE QA/QC SAMPLES, INCLUDING A TOTAL OF 17 PCB SAMPLES AND 3 PCB QA/QC SAMPLES. ETI LAB PERFORMED HAZCAT ANALYSIS OF 616 DRUM CONTENT SAMPLES AND 53 DUPLICATE QA/QC SAMPLES AS OF 9/11/93. NO SAMPLING ACTIVITIES WERE PLANNED BY ETI ON 9/11/93. THE ETI CREW WORKED ON EQUIPMENT MAINTENANCE AND DRUM NUMBERING ACTIVITIES ON 9/11/93.

C. TAT CONTINUED MONITORING THE AMBIENT AIR AT THE BREATHING ZONE OF ERCS (ETI) WORKING AREA, SHIPPING #1, DURING THE DRUM SAMPLING ACTIVITIES. NO ELEVATED READINGS WERE RECORDED ON CGI, MONITOX OR HNU EQUIPMENT.

D. TAT CONTINUED VIRGIN-DRUM INVENTORY OF DRUMS CONTAINING PRODUCT AND HAVING INFORMATION ON THE LABEL ON THE DRUMS IN THE SHIPPING #5 AREA. TAT PROVIDED AN UPDATED LIST OF THE VIRGIN DRUMS TO OSC ENGLISH ON 9/10/93.

E. TAT CONTINUED ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES. TAT CONTINUED WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE. TAT CONTINUED TO MONITOR LEAKING TANKS ON-SITE. TAT CONTINUED COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE.

AR104391

III. FUTURE PLANS

A. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. TAT TO CONTINUE TO MONITOR THE ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING

C. POLREPS TO CONTINUE TO BE DISTRIBUTED WEEKLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

**GEORGE ENGLISH, OSC
VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.681**

AR104392

POLREP 682

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING 9/18/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH DRUM SAMPLING AND REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (9/18/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.(9/16/93).	201,640	205,000
EPA INDIRECT(9/16/93)	348,979	355,000
TAT	2,087,801	2,150,000
ERCS(OHM).(04/07/92).	7,494,499	7,685,000
ERCS(ETI).(07/16/93).	30,232	100,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,360,666	10,692,515

F. REMEDIAL COSTS TO (09/18/93)

	ESTIMATED:	CEILING:
EPA DIRECT.....	96,315	100,000
EPA INDIRECT.....	146,360	150,000
TAT.....	814,894*	879,600
ERCS(OHM)...(4/28/92)	3,141,564*	3,180,000
ERCS(EHRT)..(1/22/92)	2,624,582*	2,728,840
ERCS (ETI)	160,358*	3,000,000
TOTAL REMEDIAL COSTS.	6,984,073	9,948,840
G. TOTAL PROJECT COSTS..	17,344,739	20,730,955
H. TOTAL UNALLOCATED FUNDS.....		25,020
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 674,140

TBD

AR104393

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93

EPA.....	12,609
TAT.....	329,167

M. TOTAL ENFORCEMENT = \$472,925

N. PERSONNEL ON-SCENE	EPA.....02
	ERCS(ETI)....11
	TAT.....03

II. ACTIONS TAKEN:

A. OSC ENGLISH WAS ON-SITE FROM 9/13/93 THROUGH 9/18/93 COORDINATING THE EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES. OSC LAPSLY, RPM GROSS, AND ORC WALTERS CONTINUED COORDINATION OF REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS). FAS L.MARZULLI ON-SITE THIS WEEK FROM 9/14/93 THROUGH 9/16/93 PROVIDING ADMINISTRATIVE SUPPORT TO OSC ENGLISH.

B. ETI CREW CONTINUED SAMPLING/ AND HAZCATING DRUMS IN SHIPPING NO.1 AND THE BEAM STORAGE AREAS. TO THE END OF THIS WEEK CREW COLLECTED A TOTAL OF 877 DRUM CONTENT SAMPLES AND 87 DUPLICATE QA/QC SAMPLES, INCLUDING A TOTAL OF 17 PCB SAMPLES AND 3 PCB QA/QC SAMPLES. ETI LAB PERFORMED HAZCAT ANALYSIS OF 779 DRUM CONTENT SAMPLES AND 82 DUPLICATE QA/QC SAMPLES AS OF 9/18/93. ETI ALSO COLLECTED 29 PAILS CONTENT SAMPLES AND ANALYSED 25 SUCH SAMPLES FOR HAZCATING AS OF 9/18/93. NO SAMPLING ACTIVITIES WERE PLANNED BY ETI ON 9/18/93. THE ETI CREW WORKED ON EQUIPMENT MAINTANENCE AND DRUM NUMBERING ACTIVITIES ON 9/18/93.

C. TAT CONTINUED MONITORING THE AMBIENT AIR AT THE BREATHING ZONE OF ERCS (ETI) WORKING AREA, SHIPPING #1, DURING THE DRUM SAMPLING ACTIVITIES. NO ELEVATED READINGS WERE RECORDED ON CGI, MONITOX OR HNU EQUIPMENT.

D. TAT CONTINUED "VIRGIN" DRUM INVENTORY (SEALED DRUMS CONTAINING PRODUCT AND LABEL INFORMATION) IN THE SHIPPING #5 AREA. TAT TO PROVIDE AN UPDATED LIST OF THE VIRGIN DRUMS TO OSC ENGLISH ON 9/20/93.

AR104394

E. TAT CONTINUED ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES. TAT CONTINUED WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE. TAT CONTINUED TO MONITOR TANKS ON-SITE. TAT CONTINUED COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE.

F. OSC ENGLISH TASKED TAT TO CONDUCT A WALK-THROUGH OF THE PLANT BUILDINGS TO LOCATE AND DOCUMENT INVENTORY ANY DRUMS OR CONTAINERS NOT YET STAGED IN THE DESIGNATED AREAS. TAT CONDUCTED A WALK-THROUGH ON 9/16/93 IN LEVEL C PPE. TAT WILL SUBMIT A REPORT TO OSC UPON COMPLETION OF THE INVENTORY.

G. TAT PROVIDED ASSISTANCE AND PREPARED A MEMO TO OSC ENGLISH FOR THE FUNDING REQUEST FOR THE ADDITIONAL MONIES REQUIRED FOR REMOVAL PROJECTS.

III. FUTURE PLANS

A. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. TAT TO CONTINUE TO MONITOR THE ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING

C. POLREPS TO CONTINUE TO BE DISTRIBUTED WEEKLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

GEORGE ENGLISH, OSC
VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.682

AR104395

POLREP 683

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING 9/25/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH DRUM SAMPLING AND REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (9/25/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.(9/16/93).	201,640	205,000
EPA INDIRECT(9/16/93)	348,979	355,000
TAT	2,087,801	2,150,000
ERCS(OHM)..(04/07/92).	7,494,499	7,685,000
ERCS(ETI)..(07/16/93).	30,232	100,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,360,666	10,692,515

F. REMEDIAL COSTS TO (09/25/93)

	ESTIMATED:	CEILING:
EPA DIRECT..(9/24/93)	98,268	100,000
EPA INDIRECT(9/24/93)	150,040	150,000
TAT.....	832,991*	879,600
ERCS(OHM)..(4/28/92)	3,141,564*	3,180,000
ERCS(EHRT)..(1/22/92)	2,624,582*	2,728,840
ERCS(ETI)..(9/24/93)	196,176*	3,000,000
TOTAL REMEDIAL COSTS.	7,043,621	9,948,840
G. TOTAL PROJECT COSTS..	17,404,287	20,730,955
H. TOTAL UNALLOCATED FUNDS.....		25,020
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 679,531 TBD

AR104396

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93

EPA.....	12,609
TAT.....	329,167

M. TOTAL ENFORCEMENT = \$472,925

N. PERSONNEL ON-SCENE	EPA.....01
	ERCS(ETI)....12
	TAT.....02

II. ACTIONS TAKEN:

A. OSC ENGLISH WAS ON-SITE FROM 9/20/93 THROUGH 9/25/93 COORDINATING THE EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES. OSC LAPSLEY, RPM GROSS, AND ORC WALTERS CONTINUED COORDINATION OF REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. ETI CREW COMPLETED SAMPLING/ AND HAZCATING DRUMS IN SHIPPING NO.1 AND THE BEAM STORAGE AREAS AND BEGAN OPERATIONS IN SHIPPING #5. THROUGH THE END OF THIS WEEK ETI HAS COLLECTED A TOTAL OF 1242 DRUM SAMPLES AND 126 DUPLICATE QA/QC SAMPLES, INCLUDING A TOTAL OF 17 PCB SAMPLES AND 3 PCB QA/QC SAMPLES. ETI HAS PERFORMED HAZCAT ANALYSIS OF 993 DRUM SAMPLES AND 110 DUPLICATE QA/QC SAMPLES AS OF 9/25/93. ETI ALSO COLLECTED SAMPLES FROM 29 5 GALLON CONTAINERS AND HAZCATTED THEM. NO SAMPLING ACTIVITIES WERE CONDUCTED BY ETI ON 9/25/93. THE ETI CREW WORKED ON EQUIPMENT MAINTANENCE AND DRUM NUMBERING ACTIVITIES ON 9/25/93. ETI INSTALLED A PORTABEL GAS CHROMATORGRAPH IN THEIR FIELD LAB ON 9/24/93 IN ORDER TO MORE FULLY CHARACTERIZE SAMPLES FOR WASTE PROFILING. ETI PREPARED AN INFORMATIONAL BRIEF FOR THE OSC OUTLINING DISPOSAL OPTIONS FOR THE ZINC TANK SLUDGE. ON 9/21/93 ETI INVENTORIED CYLINDERS ON SITE AND BEGAN CONTACTING MANUFACTURERS/SUPPLIERS TO REMOVE THEM.

C. TAT CONTINUED MONITORING THE AMBIENT AIR AT THE BREATHING ZONE OF ERCS (ETI) WORKING AREAS IN SHIPPING #1 AND #5 AND BEAM STORAGE DURING THE DRUM SAMPLING ACTIVITIES. NO ELEVATED READINGS WERE RECORDED ON CGI, MONITOX OR HNU EQUIPMENT, ALTHOUGH HIGH HUMIDITY INTERFERED WITH USE OF THE HNU.

AR104397

D. TAT CONTINUED "VIRGIN" DRUM INVENTORY (SEALED DRUMS CONTAINING PRODUCT AND LABEL INFORMATION) IN THE SHIPPING #5 AREA. TAT PROVIDED AN UPDATED LIST OF THE VIRGIN DRUMS TO OSC ENGLISH ON 9/20/93 AND WILL PROVIDE A NEW LIST ON 9/26/93.

E. TAT CONTINUED ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES. TAT CONTINUED WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE. TAT CONTINUED TO MONITOR TANKS ON-SITE. TAT CONTINUED COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE.

F. TAT REVIEWED AND AMENDED THE SITE GENERAL SITE SAFETY PLAN. THE PLAN WAS UPDATED TO INCLUDE ALL CURRENT ACTIVITIES FOR ALL ORAGNIZATIONS ON SITE UNDER EPA DIRECTION.

III. FUTURE PLANS

A. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. TAT TO CONTINUE TO MONITOR THE ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING

C. POLREPS TO CONTINUE TO BE DISTRIBUTED WEEKLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

GEORGE ENGLISH, OSC
VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.683

AR104398

POLREP 684

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING 10/02/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH DRUM SAMPLING AND REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (10/02/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.(9/16/93).	201,640	210,000
EPA INDIRECT(9/16/93)	348,979	362,500
TAT	2,087,801	2,150,000
ERCS(OHM).(04/07/92).	7,494,499	7,685,000
ERCS(ETI).(07/16/93).	30,232	33,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS...	10,360,666	10,638,015

F. REMEDIAL COSTS TO (10/02/93)

	ESTIMATED:	CEILING:
EPA DIRECT..(09-24-93)	98,268	110,000
EPA INDIRECT.(09-24-93)	150,040	170,000
TAT.....	847,727*	879,600
ERCS(OHM)...(4/28/92)	3,141,564*	3,180,000
ERCS(EHRT)..(1/22/92)	2,624,582*	2,728,840
ERCS(ETI)..(10/01/92)	227,649*	3,000,000
TOTAL REMEDIAL COSTS.	7,089,830	10,068,440
G. TOTAL PROJECT COSTS..	17,450,496	20,706,455
H. TOTAL UNALLOCATED FUNDS.....		49,520
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 684,152

TBD

AR104399

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93

EPA.....	12,609
TAT.....	329,167

M. TOTAL ENFORCEMENT = \$472,925

N. PERSONNEL ON-SCENE	EPA.....00
	ERCS(ETI)....11
	TAT.....03

II. ACTIONS TAKEN:

A. OSC ENGLISH COORDINATED THE EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES FROM REGION III OFFICE, AND WORKED ON PREPARATION OF ADDITIONAL FUNDING REQUEST FOR AVTEX SITE REMOVAL PROJECTS. OSC LAPSLY, RPM GROSS, AND ORC WALTERS CONTINUED COORDINATION OF REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. ETI CREW CONTINUED SAMPLING/ AND HAZCATING DRUMS IN SHIPPING #5. TO THE END OF THIS WEEK CREW COLLECTED A TOTAL OF 1577 DRUM CONTENT SAMPLES AND 159 DUPLICATE QA/QC SAMPLES, INCLUDING A TOTAL OF 17 PCB SAMPLES AND 3 PCB QA/QC SAMPLES. ETI LAB PERFORMED HAZCAT ANALYSIS OF 1099 DRUM CONTENT SAMPLES AND 106 DUPLICATE QA/QC SAMPLES AS OF 10/02/93. ETI ALSO COLLECTED 29 5 GALLON CONTAINERS AND HAZCATTED THEM. NO SAMPLING ACTIVITIES WERE CONDUCTED BY ETI ON 10/02/93. ETI CREW DID NOT WORK ON SITE ON 10/02/93. ON 09/30/93 AIR PRODUCTS REMOVED 45 OF THEIR OWN CYLINDERS FROM THE AVTEX LAB AND CYLINDER STORAGE AREAS. THE CURRENT CYLINDER INVENTORY REFLECTS WHICH CYLINDERS WERE REMOVED.

C. TAT CONTINUED MONITORING THE AMBIENT AIR AT THE ERCS (ETI) WORKING AREA, SHIPPING #5, DURING THE DRUM SAMPLING ACTIVITIES. NO ELEVATED READINGS WERE RECORDED ON CGI, MONITOX OR HNU EQUIPMENT.

D. TAT CONTINUED "VIRGIN" DRUM INVENTORY (SEALED DRUMS CONTAINING PRODUCT AND LABEL INFORMATION) IN THE SHIPPING #5 AREA. TAT PROVIDED AN UPDATED LIST OF THE VIRGIN DRUMS TO OSC ENGLISH ON 10/01/93.

AR104400

E. TAT CONTINUED ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES. TAT CONTINUED WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE. TAT CONTINUED TO MONITOR TANKS ON-SITE. TAT CONTINUED COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE.

III. FUTURE PLANS

A. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. OSC JACK OWENS WILL BE ON-SITE 10/11/93-10/22/93 TO RESUME THE ON-SITE COORDINATION OF THE EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES.

C. TAT TO CONTINUE TO MONITOR THE ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED WEEKLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

GEORGE ENGLISH, OSC
VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.684

Distribution:

TO: HARRY DAW
TO: DEBBIE DIETRICH
TO: GEORGE ENGLISH
TO: BONNIE GROSS
TO: OPA /REG.III
TO: ORC REG.III
TO: RRC OFFICE
TO: VINCENT ZENONE

(DAW.HARRY)
(DIETRICH.DEBBIE)
(ENGLISH.GEORGE)
(GROSS.BONNIE)
(OPA/REG.III)
(ORC/REG.III)
(RRC)
(ZENONE.VINCENT)

AR104401

POLREP 685

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING 10/09/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC ZENONE TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH DRUM SAMPLING AND REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO (10/09/93) UNLESS SHOWN OTHERWISE

	ESTIMATED:	CEILING:
EPA DIRECT.(9/16/93).	201,640	210,000
EPA INDIRECT(9/16/93)	348,979	362,500
TAT(10/01/93)	2,091,138	2,150,000
ERCS(OHM).(04/07/92).	7,494,499	7,685,000
ERCS(ETI).(07/16/93).	30,232	33,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,364,003	10,638,015

F. REMEDIAL COSTS TO (10/09/93)

	ESTIMATED:	CEILING:
EPA DIRECT..(09-24-93)	98,268	110,000
EPA INDIRECT.(09-24-93)	150,040	170,000
TAT.....	859,842*	879,600
ERCS(OHM)...(4/28/92)	3,141,564*	3,180,000
ERCS(EHRT)..(1/22/92)	2,624,582*	2,728,840
ERCS (ETI)..(10/01/92)	261,277*	3,000,000
TOTAL REMEDIAL COSTS.	7,135,573	10,068,440
G. TOTAL PROJECT COSTS..	17,499,576	20,706,455
H. TOTAL UNALLOCATED FUNDS.....		49,520
I. TOTAL PROJECT CEILING.....		20,755,975

J. * 10% STATE SHARE.... 688,727

TBD

AR104402

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93

EPA.....	12,609
TAT.....	329,167

M. TOTAL ENFORCEMENT = \$472,925

N. PERSONNEL ON-SCENE	EPA.....01
	ERCS(ETI)....11
	TAT.....02

II. ACTIONS TAKEN:

A. OSC ENGLISH COORDINATED THE EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES FROM REGION III OFFICE, AND WORKED ON PREPARATION OF ADDITIONAL FUNDING REQUEST FOR AVTEX SITE REMOVAL PROJECTS. OSC LAPSLY, RPM GROSS, AND ORC WALTERS CONTINUED COORDINATION OF REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS). FAS L. MARZULLI ON SITE THIS WEEK FROM 10/06/93 THRU 10/07/93.

B. ETI CREW CONTINUED SAMPLING/ AND HAZCATING DRUMS IN SHIPPING #5. TO THE END OF THIS WEEK CREW COLLECTED A TOTAL OF 1824 DRUM CONTENT SAMPLES AND 184 DUPLICATE QA/QC SAMPLES, INCLUDING A TOTAL OF 23 PCB SAMPLES AND 3 PCB QA/QC SAMPLES. ETI LAB PERFORMED HAZCAT ANALYSIS OF 1313 DRUM CONTENT SAMPLES AND 130 DUPLICATE QA/QC SAMPLES AS OF 10/09/93. ETI ALSO COLLECTED 29 5-GALLON CONTAINERS AND HAZCATTED THEM. NO SAMPLING ACTIVITIES WERE CONDUCTED BY ETI ON 10/09/93. ETI CREW DID NOT WORK ON SITE ON 10/09/93.

C. TAT CONTINUED MONITORING THE AMBIENT AIR AT THE ERCS (ETI) WORKING AREA, SHIPPING #5, DURING THE DRUM SAMPLING ACTIVITIES. NO ELEVATED READINGS WERE RECORDED ON CGI, MONITOX OR HNU EQUIPMENT.

D. TAT CONTINUED "VIRGIN" DRUM INVENTORY (SEALED DRUMS CONTAINING PRODUCT AND LABEL INFORMATION) IN THE SHIPPING #5 AREA.

AR104403

E. TAT CONTINUED ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES. TAT CONTINUED WEEKLY REMOVAL MONITORING OF DRUMS STAGED ON-SITE. TAT CONTINUED TO MONITOR TANKS ON-SITE. TAT CONTINUED COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE. ON 10/08/93 TAT DROVE THE RENTAL AUTO TO RENT-A-CAR AGENCY FOR THE CRACK IN THE WINDSHIELD. TAT ALSO RENEWED THE RENTAL AUTO CONTRACT FOR ONE MONTH ENDING 10/16/93.

F. J. GALIOTO (ETI) SUBMITTED A COPY OF THE INVENTORY OF CHEMICAL CONTAINERS IN THE PLANT LABORATORY DATED 9/15/93 TO TAT ON 10/8/93.

III. FUTURE PLANS

A. OSCS TO CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. OSC JACK OWENS WILL BE ON-SITE 10/11/93-10/22/93 TO RESUME THE ON-SITE COORDINATION OF THE EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES.

C. TAT TO CONTINUE TO MONITOR THE ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO OSC, INCLUDING COMPILATION OF INFORMATION FOR THE OSC REPORT, AND SITE DATA PACKAGING.

D. POLREPS TO CONTINUE TO BE DISTRIBUTED WEEKLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

GEORGE ENGLISH, OSC
VINCE ZENONE, OSC
USEPA REGION III
PHILADELPHIA, PA.
POLREP.685

AR104404

POLREP 686

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING 10/16/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC OWENS TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH DRUM SAMPLING AND REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX(TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO DATE NOTED

	ESTIMATED:	CEILING:
EPA DIRECT.(9/16/93)..	201,640	210,000
EPA INDIRECT(9/16/93)	348,979	362,500
TAT(10/01/93)	2,091,138	2,150,000
ERCS(OHM).(04/07/92)..	7,494,499	7,685,000
ERCS(ETI).(07/16/93)..	30,232	33,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,364,003	10,638,015

F. REMEDIAL COSTS TO (10/16/93) UNLESS OTHERWISE NOTED

	ESTIMATED:	CEILING:
EPA DIRECT.....	100,722	110,000
EPA INDIRECT.....	154,328	170,000
TAT.....	876,194*	879,600
ERCS(OHM)...(4/28/92)	3,141,564*	3,180,000
ERCS(EHRT)..(1/22/92)	2,624,582*	2,728,840
ERCS (ETI).....	297,899*	3,000,000
TOTAL REMEDIAL COSTS.	7,195,289	10,068,440

G. TOTAL PROJECT COSTS.. 17,559,292 20,706,455

H. TOTAL UNALLOCATED FUNDS..... 49,520

I. TOTAL PROJECT CEILING..... 20,755,975

J. * 10% STATE SHARE.... 694,023 TBD

AR104405

K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.

L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93

EPA.....	12,609
TAT.....	329,167

M. TOTAL ENFORCEMENT = \$472,925

N. PERSONNEL ON-SCENE	EPA.....01
	ERCS(ETI)....11
	TAT.....02

II. ACTIONS TAKEN:

A. OSC ENGLISH COORDINATED THE EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES FROM REGION III OFFICE, AND WORKED ON PREPARATION OF ADDITIONAL FUNDING REQUEST FOR AVTEX SITE REMOVAL PROJECTS. OSC LAPSLY, RPM GROSS, AND ORC WALTERS CONTINUED COORDINATION OF REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS). STEVE MIHALKO, VDEQ, ON SITE FOR ACTIVITY UPDATE AND SITE TOUR ON 10/15/93.

B. DURING THE EARLY PART OF THE WEEK, ETI SET UP A NEW TRANSITION ZONE FOR #1 PULP STORAGE AREA. ETI OVERPACKED TWO LEAKING 55-GALLON DRUMS ON 10/14/93. SAMPLING AND HAZCATTING DRUMS IN #1 PULP STORAGE AREA BY ETI CREW BEGAN ON 10/15/93. AT THE COMPLETION OF THIS WEEK THE CREW COLLECTED A TOTAL OF 1901 DRUM CONTENT SAMPLES AND 189 DUPLICATE QA/QC SAMPLES, INCLUDING A TOTAL OF 50 PCB SAMPLES AND 3 PCB QA/QC SAMPLES. ETI LAB PERFORMED HAZCAT ANALYSIS OF 1557 DRUM CONTENT SAMPLES AND 130 DUPLICATE QA/QC SAMPLES AS OF 10/16/93. NO SAMPLING ACTIVITIES WERE CONDUCTED BY ETI ON 10/16/93. ETI HAD A CREW OF 5 ON-SITE TO PERFORM MAINTENANCE AND NUMBER DRUMS ON 10/16/93.

C. TAT CONTINUED MONITORING THE AMBIENT AIR AT ERCS (ETI) WORKING AREA, #1 PULP STORAGE AREA, DURING THE DRUM SETUP AND SAMPLING ACTIVITIES. NO ELEVATED READINGS WERE RECORDED ON CGI, H2S MONITOX OR OVA EQUIPMENT.

D. "VIRGIN" DRUM INVENTORY (SEALED DRUMS CONTAINING PRODUCT AND LABEL INFORMATION) CONDUCTED BY TAT TOTALS 391 DRUMS TO DATE. THE DRUMS ARE CONSIDERED A TRUSTEE ASSET.

AR104406

E. TAT CONTINUED ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES; AND CONTINUED WEEKLY REMOVAL MONITORING OF STAGED DRUMS AND TANKS ON-SITE. COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE CONTINUED.

III. FUTURE PLANS

A. OSCS CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. TAT TO CONTINUE TO MONITOR ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO OSC.

C. POLREPS TO CONTINUE TO BE DISTRIBUTED WEEKLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

D. COMPLETION OF ALL STAGED DRUM WORK BY 11/30/93.

E. DISPOSAL OF DRUMS TO BEGIN IN LATE JANUARY 1994.

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA.

AR104407

TO: GROUP RRC
 TO: GROUP ERD/OERR
 TO: GEORGE ENGLISH
 TO: BONNIE GROSS
 TO: GROUP REGION03.TAT

(RRC)
 (ERD/OERR)
 (ENGLISH.GEORGE)
 (GROSS.BONNIE)
 (REGION03.TAT)

POLREP 687

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING 10/23/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC OWENS TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH DRUM SAMPLING AND REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX(TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO DATE NOTED

	ESTIMATED:	CEILING:
EPA DIRECT.(9/16/93).	201,640	210,000
EPA INDIRECT(9/16/93)	348,979	362,500
TAT(10/01/93)	2,091,138	2,107,000
ERCS(OHM)..(04/07/92).	7,494,499	7,685,000
ERCS(ETI)..(07/16/93).	30,232	33,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,364,003	10,595,015

F. REMEDIAL COSTS TO (10/16/93) UNLESS OTHERWISE NOTED

	ESTIMATED:	CEILING:
EPA DIRECT.....	102,999	110,000
EPA INDIRECT.....	158,520	170,000
TAT.....	886,765*	932,600
ERCS(OHM)...(4/28/92)	3,141,564*	3,180,000
ERCS(EHRT)..(1/22/92)	2,624,582*	2,728,840
ERCS (ETI).....	332,822*	3,000,000
TOTAL REMEDIAL COSTS.	7,247,552	10,121,440

G. TOTAL PROJECT COSTS.. 17,611,555 20,716,455

AR104408

H. TOTAL UNALLOCATED FUNDS.....	39,520
I. TOTAL PROJECT CEILING.....	20,755,975
J. * 10% STATE SHARE....	698,573 TBD
K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.	
L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93	
EPA.....	12,609
TAT.....	329,167
M. TOTAL ENFORCEMENT = \$472,925	
N. PERSONNEL ON-SCENE	EPA.....01 ERCS(ETI)....11 TAT.....02

II. ACTIONS TAKEN:

A. OSC ENGLISH COORDINATED THE EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES FROM REGION III OFFICE, AND WORKED ON PREPARATION OF ADDITIONAL FUNDING REQUEST FOR AVTEX SITE REMOVAL PROJECTS. OSC LAPSLEY, RPM GROSS, AND ORC WALTERS CONTINUED COORDINATION OF REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. SAMPLING AND HAZCATTING DRUMS IN #1 PULP STORAGE AREA BY ETI CREW CONTINUED DURING THE WEEK. AT THE COMPLETION OF THIS WEEK THE CREW COLLECTED A TOTAL OF 2192 DRUM CONTENT SAMPLES AND 218 DUPLICATE QA/QC SAMPLES, INCLUDING A TOTAL OF 78 PCB SAMPLES AND 3 PCB QA/QC SAMPLES. ETI LAB PERFORMED HAZCAT ANALYSIS OF 1713 DRUM CONTENT SAMPLES AND 176 DUPLICATE QA/QC SAMPLES AS OF 10/23/93. NO SAMPLING ACTIVITIES WERE CONDUCTED BY ETI ON 10/23/93. ETI HAD A CREW OF 6 ON-SITE TO PERFORM MAINTENANCE AND NUMBER DRUMS ON 10/23/93.

C. TAT CONTINUED MONITORING THE AMBIENT AIR AT ERCS (ETI) WORKING AREA, #1 PULP STORAGE AREA, DURING THE DRUM SETUP AND SAMPLING ACTIVITIES. NO ELEVATED READINGS WERE RECORDED ON CGI OR H2S MONITOX. THE OVA RECORDED ELEVATED READINGS OF 1-3 PPM ABOVE BACKGROUND IN THE BREATHING AREA OF THE #1 PULP STORAGE AREA.

AR104409

D. "VIRGIN" DRUM INVENTORY (SEALED DRUMS CONTAINING PRODUCT AND LABEL INFORMATION) CONDUCTED BY TAT TOTALS 391 DRUMS TO DATE. THE DRUMS ARE CONSIDERED A TRUSTEE ASSET.

E. TAT CONTINUED ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES; AND CONTINUED WEEKLY REMOVAL MONITORING OF STAGED DRUMS AND TANKS ON-SITE. COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE CONTINUED.

F. ON 10/21/93 A SMALL FIRE BROKE OUT IN THE FUSE BOX IN THE #1 PULP STORAGE AREA. THE FIRE OCCURRED WHEN RAINWATER DRIPPED ONTO THE ELECTRIFIED FUSE BOX CAUSING IT TO SHORT AND START ON FIRE. THE FIRE WAS IMMEDIATELY PUT OUT WITH ETI'S FIRE EXTINGUISHER. AVTEX WAS NOTIFIED AND HAD THEIR ELECTRICIAN COME OUT TO THE SITE ON 10/23/93 AND DISCONNECT ALL POWER THAT IS NOT NECESSARY TO THE PLANT.

III. FUTURE PLANS

A. OSCS CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. TAT TO CONTINUE TO MONITOR ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO OSC.

C. POLREPS TO CONTINUE TO BE DISTRIBUTED WEEKLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

D. COMPLETION OF ALL STAGED DRUM WORK BY 11/30/93.

E. DISPOSAL OF DRUMS TO BEGIN IN LATE JANUARY 1994.

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA.
POLREP.687

AR104410

TO: GROUP ERD/OERR (ERD/OERR)
 TO: GROUP RRC (RRC)
 TO: GEORGE ENGLISH (ENGLISH.GEORGE)
 TO: BONNIE GROSS (GROSS.BONNIE)
 CC: GROUP REGION03.TAT (REGION03.TAT)

POLREP 688
AVTEX FIBERS FRONT ROYAL
 FRONT ROYAL, WARREN COUNTY, VA.
 CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION
 ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN
 CC:BONNIE GROSS (3HW24)
 WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING 10/30/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC OWENS TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH DRUM SAMPLING AND REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX(TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO DATE NOTED

	ESTIMATED:	CEILING:
EPA DIRECT.(9/16/93).	201,640	210,000
EPA INDIRECT(9/16/93)	348,979	362,500
TAT(10/30/93)	2,096,929	2,107,000
ERCS(OHM).(04/07/92).	7,494,499	7,685,000
ERCS(ETI).(07/16/93).	30,232	33,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,369,794	10,595,015

F. REMEDIAL COSTS TO (10/30/93) UNLESS OTHERWISE NOTED

	ESTIMATED:	CEILING:
EPA DIRECT..(10/22/93)	102,999	110,000
EPA INDIRECT(10/22/93)	158,520	170,000
TAT.....	899,889*	932,600
ERCS(OHM)...(4/28/92)	3,141,564*	3,180,000
ERCS(EHRT)..(1/22/92)	2,624,582*	2,728,840
ERCS (ETI).....	365,312*	3,000,000

AR104411

TOTAL REMEDIAL COSTS.	7,292,866	10,121,440
G. TOTAL PROJECT COSTS..	17,662,660	20,716,455
H. TOTAL UNALLOCATED FUNDS.....		39,520
I. TOTAL PROJECT CEILING.....		20,755,975
J. * 10% STATE SHARE....	703,135	TBD
K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.		
L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93		
EPA.....	12,609	
TAT.....	329,167	
M. TOTAL ENFORCEMENT = \$472,925		
N. PERSONNEL ON-SCENE	EPA.....00	
	ERCS(ETI)....10	
	TAT.....02	

II. ACTIONS TAKEN:

A. OSC ENGLISH COORDINATED THE EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES FROM REGION III OFFICE, AND WORKED ON PREPARATION OF ADDITIONAL FUNDING REQUEST FOR AVTEX SITE REMOVAL PROJECTS. OSC LAPSLY, RPM GROSS, AND ORC WALTERS CONTINUED COORDINATION OF REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. SAMPLING AND HAZCATTING DRUMS IN #1 PULP STORAGE AREA BY ETI CREW CONTINUED DURING THE WEEK. AT THE COMPLETION OF THIS WEEK THE CREW COLLECTED A TOTAL OF 2442 DRUM CONTENT SAMPLES AND 243 DUPLICATE QA/QC SAMPLES, INCLUDING A TOTAL OF 183 PCB SAMPLES AND 3 PCB QA/QC SAMPLES. ETI LAB PERFORMED HAZCAT ANALYSIS OF 1893 DRUM CONTENT SAMPLES AND 176 DUPLICATE QA/QC SAMPLES AS OF 10/30/93. NO SAMPLING ACTIVITIES WERE CONDUCTED BY ETI ON 10/30/93. ETI HAD A CREW OF 5 ON-SITE TO PERFORM MAINTENANCE AND NUMBER DRUMS ON 10/30/93.

AR104412

C. TAT CONTINUED MONITORING THE AMBIENT AIR AT ERCS (ETI) WORKING AREA, #1 PULP STORAGE AREA, DURING THE DRUM SETUP AND SAMPLING ACTIVITIES. NO ELEVATED READINGS WERE RECORDED ON CGI OR H2S MONITOX. THE HNU RECORDED ELEVATED READINGS OF .2 - 1.5 PPM ABOVE BACKGROUND IN THE BREATHING AREA OF THE #1 PULP STORAGE AREA.

D. "VIRGIN" DRUM INVENTORY (SEALED DRUMS CONTAINING PRODUCT AND LABEL INFORMATION) CONDUCTED BY TAT TOTALS 391 DRUMS TO DATE. THE DRUMS ARE CONSIDERED A TRUSTEE ASSET.

E. TAT CONTINUED ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES; AND CONTINUED WEEKLY REMOVAL MONITORING OF STAGED DRUMS AND TANKS ON-SITE. COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE CONTINUED.

III. FUTURE PLANS

A. OSCS CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. TAT TO CONTINUE TO MONITOR ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO OSC.

C. POLREPS TO CONTINUE TO BE DISTRIBUTED WEEKLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

D. COMPLETION OF ALL STAGED DRUM WORK BY 11/30/93.

E. DISPOSAL OF DRUMS TO BEGIN IN LATE JANUARY 1994.

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA.
POLREP.688

AR104413

TO: GEORGE ENGLISH
 TO: GROUP ERD/OERR
 TO: BONNIE GROSS
 TO: GROUP REGION03.TAT
 TO: GROUP RRC

(ENGLISH.GEORGE)
 (ERD/OERR)
 (GROSS.BONNIE)
 (REGION03.TAT)
 (RRC)

POLREP 689

AVTEX FIBERS FRONT ROYAL

FRONT ROYAL, WARREN COUNTY, VA.

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN:ERD/OERR, GREGG CRYSTAL, CHARLES KLEEMAN

CC:BONNIE GROSS (3HW24)

WAYNE WALTERS (3RC21)

I. SITUATION: WEEK ENDING 11/06/93.

A. REMOVAL ACTIVITIES CONTINUE WITH DRUM RECON AND HAZARD EVALUATION. OSC OWENS TO PROVIDE SUPPORT TO OSC ENGLISH ON AN AS-NEEDED BASIS TO ENSURE CONTINUITY OF REMOVAL ACTIONS PENDING FULL TRANSITION OF SITE-LEAD TO THE REMEDIAL PROGRAM.

B. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH DRUM SAMPLING AND REMOVAL.

C. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX(TRUSTEE).

D. TRUSTEE CONTINUES SITE MAINTENANCE.

E. REMOVAL COSTS TO DATE NOTED

	ESTIMATED:	CEILING:
EPA DIRECT.(9/16/93).	201,640	210,000
EPA INDIRECT(9/16/93)	348,979	362,500
TAT(10/30/93)	2,096,929	2,150,000
ERCS(OHM).(04/07/92).	7,494,499	7,685,000
ERCS(ETI).(07/16/93).	30,232	33,000
USCG(10/01/91).....	197,515	197,515
TOTAL REMOVAL COSTS..	10,369,794	10,638,015

F. REMEDIAL COSTS TO (11/06/93) UNLESS OTHERWISE NOTED

	ESTIMATED:	CEILING:
EPA DIRECT..	104,684	110,000
EPA INDIRECT	161,400	170,000
TAT.....	913,679*	879,600
ERCS(OHM)...(4/28/92)	3,141,564*	3,180,000
ERCS(EHRT)..(1/22/92)	2,624,582*	2,728,840
ERCS (ETI).....	395,365*	3,000,000
TOTAL REMEDIAL COSTS.	7,341,274	10,068,440

AR104414

G. TOTAL PROJECT COSTS..	17,711,068	20,706,455
H. TOTAL UNALLOCATED FUNDS.....		49,520
I. TOTAL PROJECT CEILING.....		20,755,975
J. * 10% STATE SHARE....	707,519	TBD
K. ENFORCEMENT (106) COSTS RECOVERABLE BUT NOT CHARGED AGAINST THE PROJECT CEILING, ESTIMATED AT 20% OF EPA AND TAT COSTS TO 12/11/91 = \$131,149.		
L. ENFORCEMENT (106) COSTS 02/05/92 - 8/12/93		
EPA.....	12,609	
TAT.....	329,167	
M. TOTAL ENFORCEMENT = \$472,925		
N. PERSONNEL ON-SCENE	EPA.....01	
	ERCS(ETI)....11	
	TAT.....02	

II. ACTIONS TAKEN:

A. OSC ENGLISH COORDINATED THE EXPEDITED REMEDIAL DRUM SAMPLING & REMOVAL ACTIVITIES FROM REGION III OFFICE, AND WORKED ON PREPARATION OF ADDITIONAL FUNDING REQUEST FOR AVTEX SITE REMOVAL PROJECTS. OSC LAPSLY, RPM GROSS, AND ORC WALTERS CONTINUED COORDINATION OF REMEDIAL AND ENFORCEMENT ACTIVITIES FROM REGIONAL OFFICES VIA TELECOMS WITH ONSITE PERSONNEL (TAT AND ARCS).

B. SAMPLING AND HAZCATTING DRUMS IN #2 PULP STORAGE AREA BY ETI CREW CONTINUED DURING THE WEEK. ETI CONDUCTED INVENTORY OF THE CRUMB CANS IN PULP STORAGE #2. AT THE COMPLETION OF THIS WEEK THE CREW COLLECTED A TOTAL OF 2463 DRUM CONTENT SAMPLES AND 243 DUPLICATE QA/QC SAMPLES, INCLUDING A TOTAL OF 122 PCB SAMPLES AND 3 PCB QA/QC SAMPLES. ADDITIONALLY ETI COLLECTED 122 CRUMB CANS SAMPLES WITH 16 DUPLICATE SAMPLES FROM THE CRUMB CANS. ETI LAB PERFORMED HAZCAT ANALYSIS OF 2125 DRUM CONTENT SAMPLES AND 176 DUPLICATE QA/QC SAMPLES AS OF 10/30/93. NO SAMPLING ACTIVITIES WERE CONDUCTED BY ETI ON 11/05/93. ETI HAD A CREW OF 8 ON-SITE TO PERFORM MAINTENANCE AND NUMBER DRUMS ON 11/06/93.

AR104415

C. TAT CONTINUED MONITORING THE AMBIENT AIR AT ERCS (ETI) WORKING AREA, #1 PULP STORAGE AREA, DURING THE DRUM SETUP AND SAMPLING ACTIVITIES. NO ELEVATED READINGS WERE RECORDED ON CGI OR H2S MONITOX. THE HNU RECORDED ELEVATED READINGS OF .2 - 1.5 PPM ABOVE BACKGROUND IN THE BREATHING AREA OF THE #1 PULP STORAGE AREA.

D. "VIRGIN" DRUM INVENTORY (SEALED DRUMS CONTAINING PRODUCT AND LABEL INFORMATION) CONDUCTED BY TAT TOTALS 391 DRUMS TO DATE. THE DRUMS ARE CONSIDERED A TRUSTEE ASSET.

E. TAT CONTINUED ENFORCEMENT OVERSIGHT MONITORING OF THIRD PARTY AND WWTP ACTIVITIES; AND CONTINUED WEEKLY REMOVAL MONITORING OF STAGED DRUMS AND TANKS ON-SITE. COMPILATION OF INFORMATION FOR THE PREPARATION OF THE OSC REPORT AND THE CHRONOLOGY/ DATA PACKAGE MODULE CONTINUED.

III. FUTURE PLANS

A. OSCS CONTINUE TO COORDINATE ALL ASPECTS OF REMOVAL, ENFORCEMENT AND REMEDIAL ACTIVITIES WITH APPROPRIATE REGIONAL, EPA-HQ, STATE AND LOCAL OFFICIALS.

B. TAT TO CONTINUE TO MONITOR ERCS ON-SITE ACTIVITIES ON A DAILY BASIS DURING REMOVAL ACTIVITY. TAT TO RECON WWTP AREA WEEKLY AND AFTER SIGNIFICANT RAINFALL. TAT TO PROVIDE ADMINISTRATIVE SUPPORT TO OSC.

C. POLREPS TO CONTINUE TO BE DISTRIBUTED WEEKLY UNLESS INCREASED ACTIVITIES WARRANT DAILY POLREPS.

D. COMPLETION OF ALL STAGED DRUM WORK BY 11/30/93.

E. DISPOSAL OF DRUMS TO BEGIN IN LATE JANUARY 1994.

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA.
POLREP.689

AR104416

TO: GROUP RRC
O: GROUP ERD/OERR

(RRC)
(ERD/OERR)

Subject: AVTEX POLREP #690

POLREP #690

AVTEX FIBERS FRONT ROYAL

404 KENDRICK LANE

FRONT ROYAL, WARREN COUNTY, VA 22630

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN: DEBORAH DIETRICH, GREGG CRYSTAL, AND CHARLES KLEEMAN

CC: BONNIE GROSS (3HW24) AND WAYNE WALTERS (3RC21)

I. SITUATION (WEEK ENDING 11/13/93)

- A. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH CONTAINER SAMPLING AND REMOVAL.
- B. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).
- C. BANKRUPTCY COURT APPOINTED TRUSTEE CONTINUES SITE MAINTENANCE.
- D. REMOVAL COSTS TO DATE:

		ESTIMATED	CEILING
EPA DIRECT COSTS	(09/16/93)	201,640	210,000
EPA INDIRECT COSTS	(09/16/93)	348,979	362,500
TAT (E&E)	(10/30/93)	2,096,929	2,107,000
ERCS (OHM)	(04/07/92)	7,494,499	7,685,000
ERCS (ETI)	(07/16/93)	30,232	33,000
USCG	(10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS		10,369,794	10,595,015

F. REMEDIAL COSTS TO 11/13/93 (UNLESS OTHERWISE NOTED):

		ESTIMATED	CEILING
EPA DIRECT COSTS		107,512	110,000
EPA INDIRECT COSTS		166,392	170,000
TAT (E&E)		923,240	932,600
TAT (WESTON)		5,913	TBD
ERCS (OHM)	(04/28/92)	3,141,564	3,180,000
ERCS (EHRT)	(01/22/92)	2,624,582	2,728,840
ERCS (ETI)		435,329	3,000,000
TOTAL REMEDIAL COSTS		7,404,532	10,121,440

AR104417

TOTAL PROJECT COSTS	17,774,326	20,716,455
TOTAL UNALLOCATED COSTS		39,517
TOTAL PROJECT CEILING		20,755,972

G.	TEN PERCENT STATE SHARE	707,519	TBD
H.	ENFORCEMENT (106) COSTS (2/5/92-8/12/93):		
	EPA	\$ 12,609	
	TAT	\$329,167	
	TOTAL ENFORCEMENT COSTS (AGAINST PROJECT CEILING)	\$341,776	
I.	PERSONNEL ON-SCENE:		
	EPA-2		
	ERCS(ETI)-11		
	TAT-4		

II. ACTIONS TAKEN

- A. REMOVAL ACTIVITIES CONTINUE WITH THE STAGING OF CONTAINERS OF HAZARDOUS MATERIALS AND CONDUCTING OF FIELD CHARACTERIZATION TESTS. ERCS (ETI) HAVE COMPLETED 244 HAZARD CATEGORIZATION TESTS DURING THE WEEK OF 11/08-13/93, 2524 TO DATE.
- B. TRANSFER OF TAT DUTIES ON SITE HAVE BEEN MADE DURING THE WEEK OF 11/08-13/93 FROM ECOLOGY & ENVIRONMENT, INC. (E&E) TO ROY F. WESTON, INC. ORIENTATION AND FAMILIARIZATION OF SITE OPERATIONS WAS PROVIDED BY E&E DURING THIS TRANSFER/OVERLAP PERIOD.
- C. THE WASTE WATER TREATMENT PLANT HAS CEASED OPERATIONS ON MONDAY, 11/08/93, AND IS CONDUCTING CLEAN UP AND MAINTENANCE DURING WINTER OPERATIONS SHUT DOWN PERIOD.
- D. ERCS CONTINUED SAMPLING CONTAINERS IN #1 PULP STORAGE, #1 MERCERIZING CELLAR, AND ADJACENT DIALYSER ROOM. TOTAL CRUMB CANS SAMPLED THIS WEEK: 274, TOTAL TO DATE: 396. TOTAL DRUMS SAMPLED THIS WEEK: 0, TOTAL TO DATE: 2463.
- E. ERCS CONTINUED HAZARD CATERGORIZATION OF SAMPLED DRUMS, TOTAL THIS WEEK: 241, TOTAL TO DATE: 2315.
- F. ERM CONTINUED TO INSTALL MONITORING WELLS IN AREAS OF SULFATE BASINS AND WWTP.

AR104418

III. FUTURE ACTIONS

- A. REMOVAL ACTIVITIES TO CONTINUE WITH THE STAGING OF CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE AND #2 MERCERIZING CELLAR. SAMPLING OF THESE STAGED CONTAINERS TO BEGIN AFTER SAFE REARRANGEMENT COMPLETED.**
- B. CONDUCTING OF FIELD CHARACTERIZATION TESTS BY ERCS ON-SITE CHEMISTRY LAB TO CONTINUE.**
- C. TAT TO CONTINUE MONITORING OF WWTP AND SITE SAFETY REVIEW.**
- D. ERM TO CONTINUE TO INSTALL MONITORING WELLS IN AREAS OF SULFATE BASINS AND WWTP.**

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR104419

TO: GROUP RRC

(RRC)

Subject: AVTEX POLREP #691

POLREP #691

AVTEX FIBERS FRONT ROYAL

404 KENDRICK LANE

FRONT ROYAL, WARREN COUNTY, VA 22630

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN: DEBORAH DIETRICH, GREGG CRYSTAL, AND CHARLES KLEEMAN

CC: BONNIE GROSS (3HW24) AND WAYNE WALTERS (3RC21)

I. SITUATION (WEEK ENDING 11/20/93)

- A. EXPEDITED REMEDIAL ACTIVITIES CONTINUE WITH CONTAINER SAMPLING AND STAGING.
- B. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).
- C. BANKRUPTCY COURT APPOINTED TRUSTEE CONTINUES SITE MAINTENANCE.
- D. REMOVAL COSTS TO DATE:

		ESTIMATED	CEILING
EPA DIRECT COSTS	(09/16/93)	201,640	210,000
EPA INDIRECT COSTS	(09/16/93)	348,979	362,500
TAT (E&E)	(10/30/93)	2,096,929	2,107,000
ERCS (OHM)	(04/07/92)	7,494,499	7,685,000
ERCS (ETI)	(07/16/93)	30,232	33,000
USCG	(10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS		10,369,794	10,595,015

F. REMEDIAL COSTS TO 11/19/93 (UNLESS OTHERWISE NOTED):

		ESTIMATED	CEILING
EPA DIRECT COSTS		107,512	110,000
EPA INDIRECT COSTS		166,392	170,000
TAT (E&E)		923,240	932,600
TAT (WESTON)		7,812	TBD
ERCS (OHM)	(04/28/92)	3,141,564	3,180,000
ERCS (EHRT)	(01/22/92)	2,624,582	2,728,840
ERCS (ETI)		460,649	3,000,000
TOTAL REMEDIAL COSTS		7,431,751	10,121,440
TOTAL PROJECT COSTS		17,801,545	20,716,455
TOTAL UNALLOCATED COSTS			39,520
TOTAL PROJECT CEILING			20,755,975

AR104420

G. TEN PERCENT STATE SHARE 707,519 TBD

H. ENFORCEMENT (106) COSTS (2/5/92-8/12/93):

EPA	\$ 12,609
TAT	\$329,167
TOTAL ENFORCEMENT COSTS (AGAINST PROJECT CEILING)	\$341,776

I. PERSONNEL ON-SCENE: EPA-0
ERCS(ETI)-13
TAT-2

II. ACTIONS TAKEN

- A. REMOVAL ACTIVITIES CONTINUE WITH THE STAGING OF CONTAINERS OF HAZARDOUS MATERIALS AND CONDUCTING OF FIELD CHARACTERIZATION TESTS. ERCS (ETI) COMPLETED 273 HAZARD CATEGORIZATION TESTS DURING THE WEEK OF 11/14-20/93 FOR A TOTAL TO DATE OF 2797.
- B. AVTEX REPRESENTATIVES AND TWO (2) POTENTIAL MACHINERY BUYERS FROM MEXICO WERE ESCORTED ON A PROCESSING TOUR BY GANNET FLEMING SITE MANAGER ON THURSDAY, 11/18/93.
- C. ERCS COMPLETED SAMPLING CONTAINERS IN #1 PULP STORAGE, #1 MERCERIZING CELLAR, AND ADJACENT DIALYZER ROOM. ERCS BEGAN CONTAINER COLLECTION AND SAMPLING IN #2 PULP STORAGE AND #2 MERCERIZING CELLAR. A TOTAL OF 62 CRUMB CANS WERE SAMPLED THIS WEEK FOR A TOTAL TO DATE OF 458. NO DRUMS WERE SAMPLED THIS WEEK FOR TOTAL TO DATE OF 2463.
- D. ERCS CONTINUED HAZARD CATEGORIZATION OF SAMPLED CONTAINERS FOR A TOTAL THIS WEEK OF 273 AND A TOTAL TO DATE OF 2588.
- E. ERM CONTINUED TO INSTALL MONITORING WELLS IN AREAS OF SULFATE BASINS AND WWTP.

AR104421

III. FUTURE ACTIONS

- A. REMOVAL ACTIVITIES TO CONTINUE WITH THE STAGING OF CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE AND #2 MERCERIZING CELLAR. SAMPLING OF THESE STAGED CONTAINERS TO CONTINUE.**
- B. FIELD CHARACTERIZATION OF SAMPLED MATERIALS BY ERCS ON-SITE CHEMISTRY LAB TO CONTINUE.**
- C. ERM TO CONTINUE TO INSTALL MONITORING WELLS IN AREAS OF SULFATE BASINS AND WWTP.**
- D. VISIT FROM EPA TECHNICAL ASSISTANCE GROUP EXPECTED ON TUESDAY, NOVEMBER 23, 1993.**

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR104422

TO: GROUP ERD/OERR
 TO: GROUP RRC
 TO: GROUP REGION03.TAT
 TO: VINCENT ZENONE
 TO: BONNIE GROSS

(ERD/OERR)
 (RRC)
 (REGION03.TAT)
 (ZENONE.VINCENT)
 (GROSS.BONNIE)

Subject: AVTEX FIBERS POLREP #692

POLREP #692

AVTEX FIBERS FRONT ROYAL

404 KENDRICK LANE

FRONT ROYAL, WARREN COUNTY, VA 22630

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN: DEBORAH DIETRICH, GREGG CRYSTAL, AND CHARLES KLEEMAN

CC: BONNIE GROSS (3HW24) AND WAYNE WALTERS (3RC21)

I. SITUATION (WEEK ENDING 11/27/93)

- A. 24-HOUR SITE SECURITY CONTINUES.
- B. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).
- C. BANKRUPTCY COURT APPOINTED TRUSTEE CONTINUES SITE MAINTENANCE.
- D. REMOVAL COSTS TO DATE:

		ESTIMATED	CEILING
EPA DIRECT COSTS	(09/16/93)	201,640	210,000
EPA INDIRECT COSTS	(09/16/93)	348,979	362,500
TAT (E&E)	(10/30/93)	2,096,929	2,107,000
ERCS (OHM)	(04/07/92)	7,494,499	7,685,000
ERCS (ETI)	(07/16/93)	30,232	33,000
USCG	(10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS		10,369,794	10,595,015

F. REMEDIAL COSTS TO 11/27/93 (UNLESS OTHERWISE NOTED):

		ESTIMATED	CEILING
EPA DIRECT COSTS		107,512	110,000
EPA INDIRECT COSTS		166,392	170,000
TAT (E&E)		923,240	932,600
TAT (WESTON)		13,542	TBD
ERCS (OHM)	(04/28/92)	3,141,564	3,180,000
ERCS (EHRT)	(01/22/92)	2,624,582	2,728,840
ERCS (ETI)		460,649	3,000,000
TOTAL REMEDIAL COSTS		7,437,481	10,121,440
TOTAL PROJECT COSTS		17,807,275	20,716,455
TOTAL UNALLOCATED COSTS			39,520
TOTAL PROJECT CEILING			20,755,975

AR104423

G.	TEN PERCENT STATE SHARE	707,519	TBF
H.	ENFORCEMENT (106) COSTS (2/5/92-8/12/93):		
	EPA	\$ 12,609	
	TAT	\$329,167	
	TOTAL ENFORCEMENT COSTS		
	(AGAINST PROJECT CEILING)	\$341,776	
I.	PERSONNEL ON-SCENE:	EPA-0	
		ERCS(ETI)-13	
		TAT-2	

II. ACTIONS TAKEN

- A. REMOVAL ACTIVITIES CONTINUE WITH THE STAGING OF CONTAINERS OF HAZARDOUS MATERIALS AND CONDUCTING OF FIELD CHARACTERIZATION TESTS. ERCS (ETI) COMPLETED 69 HAZARD CATEGORIZATION TESTS DURING THE WEEK OF 11/22-27/93 FOR A TOTAL TO DATE OF 2755. (PREVIOUSLY ESTIMATED NUMBER OF 2797 WAS INACCURATE AS A RESULT OF EMPTY CONTAINERS).
- B. THE ERCS CONTRACTOR CONDUCTED GENERAL SITE MAINTENANCE AND PREPARED THE SITE FOR THE HOLIDAY DEMOBILIZATION.
- C. ALL PERSONNEL DEMOBILIZED FOR THE HOLIDAY ON 11/24/93.
- D. THE ERCS CONTRACTOR BEGAN STAGING CONTAINERS IN #2 PULP STORAGE AND #2 MERCERIZING CELLAR.
- E. TAT PERFORMED SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS.
- F. TAT CONTINUED GENERAL SITE HAZARD IDENTIFICATION AND MONITORED WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.
- G. ERM CONTINUED TO INSTALL MONITORING WELLS IN AREAS OF SULFATE BASINS AND WWTP.

III. FUTURE ACTIONS

- A. SITE ACTIVITIES TO RESUME AT 06:30 HOURS MONDAY, NOVEMBER 29, 1993.
- B. REMOVAL ACTIVITIES TO CONTINUE WITH THE STAGING OF CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE AND #2 MERCERIZING CELLAR. SAMPLING OF STAGED CONTAINERS TO CONTINUE.

AR104424

- C. FIELD CHARACTERIZATION OF SAMPLED MATERIALS BY ERCS ON-SITE CHEMISTRY LAB TO CONTINUE.
- D. TAT TO PERFORM SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS.
- E. TAT TO CONTINUE GENERAL SITE HAZARD IDENTIFICATION AND MONITOR WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.
- F. ERM TO CONTINUE TO INSTALL MONITORING WELLS IN AREAS OF SULFATE BASINS AND WWTP.

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR104425

TO: GROUP ERD/OERR
 TO: GROUP RRC
 TO: GROUP REGION03.TAT
 TO: BONNIE GROSS
 TO: VINCENT ZENONE

(ERD/OERR)
 (RRC)
 (REGION03.TAT)
 (GROSS.BONNIE)
 (ZENONE.VINCENT)

Subject: AVTEX FIBERS POLREP #693

POLREP #693

AVTEX FIBERS FRONT ROYAL

404 KENDRICK LANE

FRONT ROYAL, WARREN COUNTY, VA 22630

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN: DEBORAH DIETRICH, GREGG CRYSTAL, AND CHARLES KLEEMAN

CC: BONNIE GROSS (3HW24) AND WAYNE WALTERS (3RC21)

I. SITUATION (WEEK ENDING 12/4/93)

- A. 24-HOUR SITE SECURITY CONTINUES.
- B. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).
- C. BANKRUPTCY COURT APPOINTED TRUSTEE CONTINUES SITE MAINTENANCE.
- D. REMOVAL COSTS TO 12/04/93 (UNLESS OTHERWISE NOTED):

		ESTIMATED	CEILING
EPA DIRECT COSTS		204,745	210,000
EPA INDIRECT COSTS		354,643	362,500
TAT (E&E)	(11/27/93)	1,296,274	1,607,000
ERCS (OHM)	(04/07/92)	7,494,499	7,685,000
ERCS (ETI)	(10/08/93)	30,984	33,000
USCG	(10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS		9,578,660	10,095,015

F. REMEDIAL COSTS TO 12/04/93 (UNLESS OTHERWISE NOTED):

		ESTIMATED	CEILING
EPA DIRECT COSTS		105,652	120,000
EPA INDIRECT COSTS		162,424	185,000
TAT (E&E)	(11/27/93)	581,172	932,600
TAT (WESTON)		18,884	125,000
ERCS (OHM)	(04/28/92)	3,141,564	3,180,000
ERCS (EHRT)	(01/22/92)	2,624,582	2,728,840
ERCS (ETI)	(12/04/93)	527,175	2,850,000
TOTAL REMEDIAL COSTS		7,161,453	10,121,440
TOTAL PROJECT COSTS		16,740,113	20,216,455
TOTAL UNALLOCATED COSTS			539,520.
TOTAL PROJECT CEILING			20,755,97

AR104426

G.	TEN PERCENT STATE SHARE	707,519	TBD
H.	ENFORCEMENT (106) COSTS (2/5/92-8/12/93):		
	EPA	\$ 12,609	
	TAT (E&E)	\$170,654	
	TOTAL ENFORCEMENT COSTS		
	(AGAINST PROJECT CEILING)	\$183,263	
I.	PERSONNEL ON-SCENE:		
	EPA-1		
	ERCS(ETI)-16		
	TAT-2		

II. ACTIONS TAKEN

- A. THE ERCS CONTRACTOR CONTINUED STAGING CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE FROM ROOMS AND BUILDINGS OF THE NORTHEASTERN SECTOR OF THE FACILITY.
- B. REMOVAL ACTIVITIES BY ERCS CONTINUED WITH THE CONDUCTING OF FIELD CHARACTERIZATION TESTS, SCREENING SAMPLES FOR POTENTIAL PCB CONTENT AND GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS.
- C. TAT PERFORMED SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS.
- D. TAT CONTINUED GENERAL SITE HAZARD IDENTIFICATION AND MONITORED WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.
- E. ERM CONTINUED TO INSTALL MONITORING WELLS IN AREAS OF SULFATE BASINS, WWTP AND ON WESTERN FLOOD PLAIN OF SOUTH FORK SHENANDOAH RIVER, ACROSS FROM WWTP.
- F. PROJECT COSTS ADJUSTMENTS MADE FROM 11/27/93 ACTUAL COSTS OF TAT (E&E) AS CORRESPONDED TO EPA FAS LINDA MARZULLI, DOCUMENTED 12/02/93 AS A REFLECTION OF A LOWER ADMINISTRATIVE MULTIPLIER THAN ESTIMATED PREVIOUSLY.

III. FUTURE ACTIONS

- A. REMOVAL ACTIVITIES TO CONTINUE WITH THE STAGING OF CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE FROM ROOMS AND BUILDINGS OF THE NORTHEASTERN SECTOR OF THE FACILITY.
- B. ERCS TO DESIGN AND BEGIN CONSTRUCTION OF OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES FOR LESS EXPENSIVE TRANSPORT AND DISPOSAL.

AR104427

- C. ERCS ON-SITE CHEMISTRY LAB TEAM TO CONTINUE WITH THE CONDUCTING OF FIELD CHARACTERIZATION TESTS, SCREENING SAMPLES FOR POTENTIAL PCB CONTENT AND GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS.
- D. TAT TO PERFORM SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS.
- E. TAT TO CONTINUE GENERAL SITE HAZARD IDENTIFICATION AND MONITOR WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.
- F. ERM TO CONTINUE TO INSTALL MONITORING WELLS IN AREAS OF SULFATE BASINS, WWTP AND ON WESTERN FLOOD PLAIN OF SOUTH FORK SHENANDOAH RIVER, ACROSS FROM WWTP.

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR104428

TO: GROUP RRC
TO: GROUP ERD/OERR
TO: GROUP REGION03.TAT

(RRC)
(ERD/OERR)
(REGION03.TAT)

POLREP #694

AVTEX FIBERS FRONT ROYAL

404 KENDRICK LANE

FRONT ROYAL, WARREN COUNTY, VA 22630

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN: DEBORAH DIETRICH, GREGG CRYSTAL, AND CHARLES KLEEMAN

CC: BONNIE GROSS (3HW24) AND WAYNE WALTERS (3RC21)

- I. SITUATION (WEEK ENDING 12/11/93)
- A. 24-HOUR SITE SECURITY CONTINUES.
 - B. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).
 - C. BANKRUPTCY COURT APPOINTED TRUSTEE CONTINUES SITE MAINTENANCE.
 - D. ERM WWTP OPERATORS INDICATE THAT THE RATE OF SULFATE BASIN FILLING BY PRECIPITATION AND SEWER RUNOFF COULD REQUIRE START-UP BY BEGINNING OF 1994 (WWTP SHUT DOWN OPERATIONS ON 11/08/93).

E. REMOVAL COSTS TO DATE:

	ESTIMATED	CEILING
EPA DIRECT COSTS	204,745	310,000
EPA INDIRECT COSTS	354,643	662,500
TAT (E&E) (11/27/93)	1,296,274	1,607,000
ERCS (OHM) (04/07/92)	7,494,499	7,685,000
ERCS (ETI) (10/08/93)	30,984	33,000
USCG (10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS	9,578,660	10,495,015

F. REMEDIAL COSTS TO 12/11/93 (UNLESS OTHERWISE NOTED):

	ESTIMATED	CEILING
EPA DIRECT COSTS	105,652	159,520
EPA INDIRECT COSTS	162,424	285,000
TAT (E&E) (11/27/93)	581,172	932,600
TAT (WESTON)	23,893	125,000
ERCS (OHM) (04/28/92)	3,141,564	3,180,000
ERCS (EHRT) (01/22/92)	2,624,582	2,728,840
ERCS (ETI)	561,490	2,850,000
TOTAL REMEDIAL COSTS	7,200,777	10,260,960
TOTAL PROJECT COSTS	16,779,437	20,755,975
TOTAL UNALLOCATED COSTS		0
TOTAL PROJECT CEILING		20,755,975

AR104429

G.	TEN PERCENT STATE SHARE	707,519	TBD
H.	ENFORCEMENT (106) COSTS (2/5/92-8/12/93):		
	EPA	\$ 12,609	
	TAT	\$170,654	
	TOTAL ENFORCEMENT COSTS (AGAINST PROJECT CEILING)	\$183,263	
I.	PERSONNEL ON-SCENE:		
	EPA-0		
	ERCS(ETI)-17		
	TAT-2		

II. ACTIONS TAKEN

- A. THE ERCS CONTRACTOR CONTINUED STAGING CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE FROM ROOMS AND BUILDINGS OF THE NORTHEASTERN SECTOR OF THE FACILITY, AND CONTAINERS FROM THE NORTHWESTERN AND CENTRAL SECTORS WERE STAGED IN SHIPPING #1.
- B. REMOVAL ACTIVITIES BY ERCS CONTINUED WITH THE CONDUCTING OF FIELD CHARACTERIZATION TESTS, SCREENING SAMPLES FOR POTENTIAL PCB CONTENT AND GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS.
- C. ERCS BEGAN DESIGN AND CONSTRUCTION OF OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES FOR LESS EXPENSIVE TRANSPORT AND DISPOSAL.
- D. TAT PERFORMED SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS.
- E. TAT CONTINUED GENERAL SITE HAZARD IDENTIFICATION AND MONITORED WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.
- F. ERM CONTINUED TO INSTALL MONITORING WELLS IN AREAS OF SULFATE BASINS, WWTP AND ON WESTERN FLOOD PLAIN OF SOUTH FORK SHENANDOAH RIVER, ACROSS FROM WWTP.

III. FUTURE ACTIONS

- A. REMOVAL ACTIVITIES TO CONTINUE WITH THE STAGING OF CONTAINERS OF HAZARDOUS MATERIALS IN #1 SHIPPING FROM THE NORTHWESTERN AND CENTRAL SECTORS, AND IN #2 PULP STORAGE FROM ROOMS AND BUILDINGS OF THE SOUTHEASTERN SECTOR OF THE FACILITY.

AR104430

- B. ERCS TO CONTINUE CONSTRUCTION OF OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES FOR LESS EXPENSIVE TRANSPORT AND DISPOSAL.
- C. ERCS ON-SITE CHEMISTRY LAB TEAM TO CONTINUE WITH THE CONDUCTING OF FIELD CHARACTERIZATION TESTS, SCREENING SAMPLES FOR POTENTIAL PCB CONTENT AND GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS.
- D. TAT TO PERFORM SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS.
- E. TAT TO CONTINUE GENERAL SITE HAZARD IDENTIFICATION AND MONITOR WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.
- F. ERM TO CONTINUE TO INSTALL AND DEVELOP MONITORING WELLS IN AREAS OF SULFATE BASINS, WWTP AND ON WESTERN FLOOD PLAIN OF SOUTH FORK SHENANDOAH RIVER, ACROSS FROM WWTP.

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR104431

TO: GROUP RRC
TO: GROUP REGION03.TAT
TO: GROUP ERD/OERR

(RRC)
(REGION03.TAT)
(ERD/OERR)

POLREP #695

AVTEX FIBERS FRONT ROYAL

404 KENDRICK LANE

FRONT ROYAL, WARREN COUNTY, VA 22630

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN: DEBORAH DIETRICH, GREGG CRYSTAL, AND CHARLES KLEEMAN

CC: BONNIE GROSS (3HW24) AND WAYNE WALTERS (3RC21)

I. SITUATION (WEEK ENDING SATURDAY, DECEMBER 18, 1993)

- A. 24-HOUR SITE SECURITY CONTINUES.
- B. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).
- C. BANKRUPTCY COURT APPOINTED TRUSTEE CONTINUES SITE MAINTENANCE.
- D. ERM WWTP OPERATORS INDICATE THAT THE RATE OF SULFATE BASIN FILLING BY PRECIPITATION AND SEWER RUNOFF COULD REQUIRE START-UP BY BEGINNING OF 1994 (WWTP SHUT DOWN OPERATIONS ON 11/08/93).
- E. REMOVAL COSTS TO DATE (COB 12/17/93):

	ESTIMATED	CEILING
EPA DIRECT COSTS	205,942	310,000
EPA INDIRECT COSTS	356,531	662,500
TAT (E&E) (11/27/93)	1,296,274	1,607,000
ERCS (OHM) (04/07/92)	7,494,499	7,685,000
ERCS (ETI) (10/08/93)	30,984	33,000
USCG (10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS	9,581,745	10,495,015

F. REMEDIAL COSTS TO DATE (COB 12/17/93 UNLESS OTHERWISE NOTED):

	ESTIMATED	CEILING
EPA DIRECT COSTS	107,455	159,520
EPA INDIRECT COSTS	165,624	285,000
TAT (E&E) (11/27/93)	581,172	932,600
TAT (WESTON)	27,947	125,000
ERCS (OHM) (04/28/92)	3,141,564	3,180,000
ERCS (EHRT) (01/22/92)	2,624,582	2,728,840
ERCS (ETI) (12/18/93)	645,948	2,850,000
TOTAL REMEDIAL COSTS	7,294,292	10,260,960

AR104432

TOTAL PROJECT COSTS	16,876,037	20,755,975
TOTAL UNALLOCATED COSTS		0
TOTAL PROJECT CEILING		20,755,975

G. TEN PERCENT STATE SHARE 707,519 TBD

H. ENFORCEMENT (106) COSTS (2/5/92-8/12/93):

EPA	\$ 12,609
TAT	\$170,654

TOTAL ENFORCEMENT COSTS
(AGAINST PROJECT CEILING) \$183,263

I. PERSONNEL ON-SCENE: EPA-2
ERCS(ETI)-14
TAT-2

II. ACTIONS TAKEN

- A. THE ERCS CONTRACTOR CONTINUED STAGING CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE FROM ROOMS AND BUILDINGS OF THE NORTHEASTERN SECTOR OF THE FACILITY, AND CONTAINERS FROM THE NORTHWESTERN AND CENTRAL SECTORS WERE STAGED IN SHIPPING #1.
- B. REMOVAL ACTIVITIES BY ERCS CONTINUED WITH THE CONTINUATION OF FIELD CHARACTERIZATION TESTS, SCREENING SAMPLES FOR POTENTIAL PCB CONTENT, AND GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS.
- C. ERCS CONTINUED DESIGN AND CONSTRUCTION OF OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES IN PREPARATION FOR TRANSPORTATION AND DISPOSAL.
- D. TAT PERFORMED SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS.
- E. TAT CONTINUED GENERAL SITE HAZARD IDENTIFICATION AND MONITORED WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.
- F. ERM CONTINUED TO INSTALL MONITORING WELLS IN AREAS OF SULFATE BASINS, WWTP, AND ON WESTERN FLOOD PLAIN OF SOUTH FORK SHENANDOAH RIVER, ACROSS FROM WWTP.
- G. ERCS DEMOBILIZED THE GAS CHROMATOGRAPH ON FRIDAY, 12/17/93.

AR104433

III. FUTURE ACTIONS

- A. REMOVAL ACTIVITIES TO CONTINUE WITH THE STAGING OF CONTAINERS OF HAZARDOUS MATERIALS IN #1 SHIPPING FROM THE NORTHWESTERN AND CENTRAL SECTORS, AND IN #2 PULP STORAGE FROM ROOMS AND BUILDINGS OF THE SOUTHEASTERN SECTOR OF THE FACILITY.**
- B. ERCS TO CONTINUE CONSTRUCTION OF OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES FOR LESS EXPENSIVE TRANSPORT AND DISPOSAL.**
- C. ERCS ON-SITE CHEMISTRY LAB TEAM TO CONTINUE WITH THE CONDUCTING OF GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS.**
- D. TAT TO PERFORM SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS.**
- E. TAT TO CONTINUE GENERAL SITE HAZARD IDENTIFICATION AND MONITOR WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.**
- F. ERM TO CONTINUE TO INSTALL AND DEVELOP MONITORING WELLS IN AREAS OF SULFATE BASINS, WWTP AND ON WESTERN FLOOD PLAIN OF SOUTH FORK SHENANDOAH RIVER, ACROSS FROM WWTP**
- G. ERCS TO PREPARE SITE FOR HOLIDAY DEMOBILIZATION. ALL REMOVAL PERSONNEL TO DEMOBILIZE BY COB WEDNESDAY, 12/22/93.**

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR104434

TO: GROUP RRC
TO: GROUP ERD/OERR
TO: GROUP REGION03.TAT

(RRC)
(ERD/OERR)
(REGION03.TAT)

POLREP #696

AVTEX FIBERS FRONT ROYAL

404 KENDRICK LANE

FRONT ROYAL, WARREN COUNTY, VA 22630

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN: DEBORAH DIETRICH, GREGG CRYSTAL, AND CHARLES KLEEMAN

CC: BONNIE GROSS (3HW24) AND WAYNE WALTERS (3RC21)

I. SITUATION (WEEK ENDING SATURDAY, DECEMBER 25, 1993)

- A. 24-HOUR SITE SECURITY CONTINUES.
- B. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).
- C. BANKRUPTCY COURT APPOINTED TRUSTEE CONTINUES SITE MAINTENANCE.
- D. ERM WWTP OPERATORS INDICATE THAT THE RATE OF SULFATE BASIN FILLING BY PRECIPITATION AND SEWER RUNOFF COULD REQUIRE START-UP BY BEGINNING OF 1994 (WWTP SHUT DOWN OPERATIONS ON 11/08/93).
- E. EPA, ERCS AND TAT DEMOBILIZED FOR HOLIDAY ON 12/22/93 UNTIL 01/10/94.

F. REMOVAL COSTS TO DATE (COB 12/25/93):

	ESTIMATED	CEILING
EPA DIRECT COSTS	205,942	310,000
EPA INDIRECT COSTS	356,531	662,500
TAT (E&E) (11/27/93)	1,296,274	1,607,000
ERCS (OHM) (04/07/92)	7,494,499	7,685,000
ERCS (ETI) (10/08/93)	30,984	33,000
USCG (10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS	9,581,745	10,495,015

G. REMEDIAL COSTS TO DATE (COB 12/25/93 UNLESS OTHERWISE NOTED):

	ESTIMATED	CEILING
EPA DIRECT COSTS	107,764	159,520
EPA INDIRECT COSTS	166,232	285,000
TAT (E&E) (11/27/93)	581,172	932,600
TAT (WESTON)	30,640	125,000
ERCS (OHM) (04/28/92)	3,141,564	3,180,000
ERCS (EHRT) (01/22/92)	2,624,582	2,728,840
ERCS (ETI) (12/20/93)	650,832	2,850,000

AR104435

	TOTAL REMEDIAL COSTS	7,302,786	10,260,960
	TOTAL PROJECT COSTS	16,884,531	20,755,975
	TOTAL UNALLOCATED COSTS		0
	TOTAL PROJECT CEILING		20,755,975
H.	TEN PERCENT STATE SHARE	707,519	TBD
I.	ENFORCEMENT (106) COSTS (2/5/92-8/12/93):		
	EPA	\$ 12,609	
	TAT	\$170,654	
	TOTAL ENFORCEMENT COSTS		
	(AGAINST PROJECT CEILING)	\$183,263	
J.	PERSONNEL ON-SCENE:	TAT-2	
		ERCS(ETI)-14	

II. ACTIONS TAKEN

- A. THE ERCS CONTRACTOR CONTINUED STAGING CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE FROM ROOMS AND BUILDINGS OF THE NORTHEASTERN SECTOR OF THE FACILITY, AND CONTAINERS FROM THE NORTHWESTERN AND CENTRAL SECTORS WERE STAGED IN SHIPPING #1.**
- B. REMOVAL ACTIVITIES BY ERCS CONTINUED WITH THE CONTINUATION OF FIELD CHARACTERIZATION TESTS, SCREENING SAMPLES FOR POTENTIAL PCB CONTENT, AND GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS.**
- C. ERCS CONTINUED DESIGN AND CONSTRUCTION OF OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES IN PREPARATION FOR TRANSPORTATION AND DISPOSAL.**
- D. TAT PERFORMED SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS.**
- E. TAT CONTINUED GENERAL SITE HAZARD IDENTIFICATION AND MONITORED WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.**
- F. ERM CONTINUED TO INSTALL MONITORING WELLS IN AREAS OF SULFATE BASINS, WWTP, AND ON WESTERN FLOOD PLAIN OF SOUTH FORK SHENANDOAH RIVER, ACROSS FROM WWTP.**

III. FUTURE ACTIONS

- A. REMOVAL ACTIVITIES TO CONTINUE WITH THE STAGING OF CONTAINERS OF HAZARDOUS MATERIALS IN #1 SHIPPING FROM THE NORTHWESTERN AND CENTRAL SECTORS, AND IN #2 PULP STORAGE FROM ROOMS AND BUILDINGS OF THE SOUTHEASTERN SECTOR OF THE FACILITY.**

AR104436

- B. ERCS TO CONTINUE CONSTRUCTION OF OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES FOR LESS EXPENSIVE TRANSPORT AND DISPOSAL.
- C. ERCS ON-SITE CHEMISTRY LAB TEAM TO CONTINUE WITH THE CONDUCTING OF GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS.
- D. TAT TO PERFORM SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS.
- E. TAT TO CONTINUE GENERAL SITE HAZARD IDENTIFICATION AND MONITOR WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.
- F. ERM TO COMPLETE INSTALLATION AND DEVELOPMENT OF MONITORING WELLS IN AREAS OF SULFATE BASINS, WWTP AND ON WESTERN FLOOD PLAIN OF SOUTH FORK SHENANDOAH RIVER, ACROSS FROM WWTP.
- G. EPA, ERCS AND TAT TO RESUME REMOVAL ACTIVITIES ON SITE BEGINNING 01/10/94.

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR104437

TO: GROUP RRC
TO: GROUP ERD/OERR
TO: GROUP REGION03.TAT

(RRC)
(ERD/OERR)
(REGION03.TAT)

POLREP #697

AVTEX FIBERS FRONT ROYAL

404 KENDRICK LANE

FRONT ROYAL, WARREN COUNTY, VA 22630

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN: DEBORAH DIETRICH, GREGG CRYSTAL, AND CHARLES KLEEMAN

CC: BONNIE GROSS (3HW24) AND WAYNE WALTERS (3RC21)

I. SITUATION (WEEK OF FRIDAY, JANUARY 14, 1994)

- A. 24-HOUR SITE SECURITY CONTINUES.
- B. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).
- C. BANKRUPTCY COURT APPOINTED TRUSTEE CONTINUES SITE MAINTENANCE.
- D. ERM WWTP OPERATORS INDICATE THAT THE RATE OF SULFATE BASIN FILLING BY PRECIPITATION AND SEWER RUNOFF COULD REQUIRE START-UP BY BEGINNING OF FEBRUARY, 1994 (WWTP SHUT DOWN OPERATIONS ON 11/08/93). WORK PLAN FOR LIMITED DISCHARGE OF SULFATE BASIN #5 TO BE SUBMITTED BY PRP (FMC) AND THEN REVIEWED BY EPA AND VDEQ.

E. REMOVAL COSTS TO DATE (COB 1/14/94):

	ESTIMATED	CEILING
EPA DIRECT COSTS	205,942	310,000
EPA INDIRECT COSTS	356,531	662,500
TAT (E&E) (11/27/93)	1,296,274	1,607,000
ERCS (OHM) (04/07/92)	7,494,499	7,685,000
ERCS (ETI) (10/08/93)	30,984	33,000
USCG (10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS	9,581,745	10,495,015

F. REMEDIAL COSTS TO DATE (COB 1/14/94 UNLESS OTHERWISE NOTED):

	ESTIMATED	CEILING
EPA DIRECT COSTS	109,071	159,520
EPA INDIRECT COSTS	168,504	285,000
TAT (E&E) (11/27/93)	581,172	932,600
TAT (WESTON)	35,848	125,000
ERCS (OHM) (04/28/92)	3,141,564	3,180,000
ERCS (EHRT) (01/22/92)	2,624,582	2,728,840
ERCS (ETI)	695,347	2,850,000
TOTAL REMEDIAL COSTS	7,356,088	10,260,960

AR104438

TOTAL PROJECT COSTS	16,937,833	20,755,975
TOTAL UNALLOCATED COSTS		0
TOTAL PROJECT CEILING		20,755,975

G.	TEN PERCENT STATE SHARE	707,519	TBD
H.	ENFORCEMENT (106) COSTS (2/5/92-8/12/93):		
	EPA	\$ 12,609	
	TAT	\$170,654	
	TOTAL ENFORCEMENT COSTS (AGAINST PROJECT CEILING)	\$183,263	

I. PERSONNEL ON-SCENE: EPA-1
ERCS(ETI)-16
TAT-2

II. ACTIONS TAKEN

- A. THE ERCS AND TAT MOBILIZED ONTO SITE 01/10/94 TO RESUME REMOVAL ACTIVITIES.
- B. THE ERCS CONTRACTOR CONTINUED STAGING CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE FROM ROOMS AND BUILDINGS OF SECTIONS I, II, III, V, VI AND VII. COLLECTIONS OF LABORATORY GRADE CONTAINERS FROM THE NORTHWESTERN AND CENTRAL SECTORS WERE STAGED IN #2 PULP STORAGE.
- C. REMOVAL ACTIVITIES BY ERCS CONTINUED WITH THE CONTINUATION OF FIELD CHARACTERIZATION TESTS AND GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS.
- D. ERCS CONTINUE CONSTRUCTION OF OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES IN PREPARATION FOR TRANSPORTATION AND DISPOSAL.
- E. EPA OSC ENGLISH AND TAT PROVIDE EPA TITLE III REPRESENTATIVES, CHARLES STEWART AND AL BROWN, WITH A SITE TOUR OF FACILITY AND REMOVAL OPERATIONS. SAME EPA REPRESENTATIVES CONVENED WITH LOCAL EMERGENCY PLANNING COMMITTEE CONCERNING HEALTH AND SAFETY PLANNING AND EMERGENCY RESPONSE TRAINING.
- F. TAT PERFORMED SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS, REVIEWED SAFETY OF OIL-WATER PUMPING SYSTEM, PROVIDED AIR MONITORING OF SITE ACTIVITY AREAS AS DIRECTED BY EPA.
- G. TAT CONTINUED GENERAL SITE HAZARD IDENTIFICATION AND MONITORED WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS AS TASKED BY EPA.

AR104439

- H. ERM MOBILIZED ONTO SITE JANUARY 12, TO BEGIN MONITORING WELL SAMPLING ON ENTIRE SITE (GOAL OF APPROXIMATELY 70 " 90 WELLS IN THE NEXT THREE WEEKS).

III. FUTURE ACTIONS

- A. REMOVAL ACTIVITIES TO CONTINUE WITH THE INVENTORYING AND STAGING OF CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE.
- B. ERCS TO BEGIN PUMPING OF DRUMS THROUGH OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES FOR LESS EXPENSIVE TRANSPORT AND DISPOSAL. DRUMS OF LOW VISCOSITY ORGANIC LIQUIDS ARE PLANNED TO BE BULKED BY PUMPING INTO LARGE CONTAINMENT TANKS.
- C. ERCS ON-SITE CHEMISTRY LAB TEAM TO CONTINUE WITH THE CONDUCTING OF GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS AND BEGIN LAB-PACKING OPERATIONS .
- D. TAT TO PERFORM SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS AND AIR MONITORING IN DRUM PUMPING AREA (OIL-WATER SEPARATION AND FILTRATION SYSTEM).
- E. TAT TO CONTINUE GENERAL SITE HAZARD IDENTIFICATION AND MONITOR WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.
- F. ERM TO CONTINUE TO SAMPLE MONITORING WELLS OF ENTIRE SITE AS ARCS MONITOR AND TAKE SPLIT SAMPLES AS WELL.
- G. EPA TECHNICAL ASSISTANCE GRANT REPRESENTATIVES AND VDEQ TO BE ON SITE 1/25/94 TO REVIEW SITE ACTIVITIES.
- H. ERM WWTP OPERATORS TO PROVIDE EPA AND VDEQ WITH PLANS FOR DISCHARGE FROM SULFATE BASIN #5.

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR104440

TO: GROUP RRC
O: GROUP ERD/OERR
TO: GROUP REGION03.TAT

(RRC)
(ERD/OERR)
(REGION03.TAT)

POLREP #698

AVTEX FIBERS FRONT ROYAL

404 KENDRICK LANE

FRONT ROYAL, WARREN COUNTY, VA 22630

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN: DEBORAH DIETRICH, GREGG CRYSTAL, AND CHARLES KLEEMAN

CC: BONNIE GROSS (3HW24) AND WAYNE WALTERS (3RC21)

I. SITUATION (WEEK OF THURSDAY, JANUARY 20, 1994)

- A. 24-HOUR SITE SECURITY CONTINUES.
- B. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).
- C. BANKRUPTCY COURT APPOINTED TRUSTEE CONTINUES SITE MAINTENANCE.
- D. ERM WWTP OPERATORS INDICATE THAT THE RATE OF SULFATE BASIN FILLING BY PRECIPITATION AND SEWER RUNOFF WILL REQUIRE START-UP BY BEGINNING OF FEBRUARY 1994 (WWTP SHUT DOWN OPERATIONS ON 11/08/93). WORK PLAN FOR LIMITED DISCHARGE OF SULFATE BASIN #5 TO BE SUBMITTED BY PRP (FMC) AND THEN REVIEWED BY EPA AND VDEQ.
- E. REMOVAL COSTS TO DATE (COB 1/20/94):

	ESTIMATED	CEILING
EPA DIRECT COSTS	205,942	310,000
EPA INDIRECT COSTS	356,531	662,500
TAT (E&E) (11/27/93)	1,296,274	1,607,000
ERCS (OHM) (04/07/92)	7,494,499	7,685,000
ERCS (ETI) (10/08/93)	30,984	33,000
USCG (10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS	9,581,745	10,495,015

F. REMEDIAL COSTS TO DATE (COB 1/20/94 UNLESS OTHERWISE NOTED):

	ESTIMATED	CEILING
EPA DIRECT COSTS	110,938	159,520
EPA INDIRECT COSTS	171,672	285,000
TAT (E&E) (11/27/93)	581,172	932,600
TAT (WESTON)	39,851	125,000
ERCS (OHM) (04/28/92)	3,141,564	3,180,000
ERCS (EHRT) (01/22/92)	2,624,582	2,728,840
ERCS (ETI)	724,437	2,850,000
TOTAL REMEDIAL COSTS	7,394,216	10,260,960

AR104441

TOTAL PROJECT COSTS	16,975,961	20,755,97
TOTAL UNALLOCATED COSTS		
TOTAL PROJECT CEILING		20,755,975

G.	TEN PERCENT STATE SHARE	707,519	TBD
H.	ENFORCEMENT (106) COSTS (2/5/92-8/12/93):		
	EPA	\$ 12,609	
	TAT	\$170,654	

TOTAL ENFORCEMENT COSTS
(AGAINST PROJECT CEILING) \$183,263

I. PERSONNEL ON-SCENE: EPA-1
ERCS(ETI)-16
TAT-2

II. ACTIONS TAKEN

- A. THE ERCS CONTRACTOR CONTINUED STAGING CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE FROM ROOMS AND BUILDINGS OF THE CENTRAL EASTERN SECTOR OF THE FACILITY, AND LABORATORY GRADE CONTAINERS FROM THE NORTHWESTERN AND CENTRAL SECTORS WERE STAGED IN #2 PULP STORAGE.
- B. REMOVAL ACTIVITIES BY ERCS RESUMED WITH THE CONTINUATION OF FIELD CHARACTERIZATION TESTS AND GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS, AND DEVELOPING LAB-PACKING GROUPS.
- C. ERCS COMPLETED CONSTRUCTION OF OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES IN PREPARATION FOR TRANSPORTATION AND DISPOSAL. LIMITED QUANTITIES PUMPED AS BITTERLY COLD TEMPERATURES HALTED OPERATIONS (15 DRUMS OF LOW VISCOSITY ORGANIC LIQUIDS TOTALING 541 GALLONS BULKED).
- D. TAT PERFORMED SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS, REVIEWED SAFETY OF OIL-WATER PUMPING SYSTEM, PROVIDED AIR MONITORING OF SITE ACTIVITY AREAS.
- E. TAT CONTINUED GENERAL SITE HAZARD IDENTIFICATION AND MONITORED WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.
- F. ERM MOBILIZED ONTO SITE TO BEGIN MONITORING WELL SAMPLING ON ENTIRE SITE, BUT BITTERLY COLD TEMPERATURES HALTED OPERATIONS JANUARY 19, UNTIL WEEK OF JANUARY 24, 1994.

AR104442

III. FUTURE ACTIONS

- A. REMOVAL ACTIVITIES TO CONTINUE WITH THE INVENTORYING AND STAGING OF CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE.**
- B. ERCS TO CONTINUE PUMPING OF DRUMS THROUGH OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES FOR LESS EXPENSIVE TRANSPORT AND DISPOSAL.**
- C. ERCS ON-SITE CHEMISTRY LAB TEAM TO CONTINUE WITH THE CONDUCTING OF GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS AND CONTINUE LAB-PACKING OPERATIONS.**
- D. TAT TO PERFORM SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS AND AIR MONITORING IN DRUM PUMPING AREA (OIL-WATER SEPARATION AND FILTRATION SYSTEM).**
- E. TAT TO CONTINUE GENERAL SITE HAZARD IDENTIFICATION AND MONITOR WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.**
- F. ERM TO CONTINUE TO SAMPLE MONITORING WELLS OF ENTIRE SITE AS ARCS MONITOR AND TAKE SPLIT SAMPLES AS WELL.**
- G. EPA TECHNICAL ASSISTANCE GRANT REPRESENTATIVES AND VDEQ TO BE ON SITE 1/25/94 TO REVIEW SITE ACTIVITIES.**
- H. ERM WWTP OPERATORS TO FIX BROKEN PIPES AND PUMPS FROM BITTERLY COLD TEMPERATURES AND PROVIDING EPA AND VDEQ WITH PLANS FOR DISCHARGE FROM SULFATE BASIN #5.**

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR104443

TO: GROUP RRC
TO: GROUP ERD/OERR
TO: GROUP REGION03.TAT

(RRC)
(ERD/OERR)
(REGION03.TAT)

POLREP #699

AVTEX FIBERS FRONT ROYAL

404 KENDRICK LANE

FRONT ROYAL, WARREN COUNTY, VA 22630

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN: DEBORAH DIETRICH, GREGG CRYSTAL, AND CHARLES KLEEMAN

CC: BONNIE GROSS (3HW24) AND WAYNE WALTERS (3RC21)

I. SITUATION (WEEK OF FRIDAY, JANUARY 28, 1994)

- A. 24-HOUR SITE SECURITY CONTINUES.
- B. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).
- C. BANKRUPTCY COURT APPOINTED TRUSTEE CONTINUES SITE MAINTENANCE.
- D. ERM WWTP OPERATORS INDICATE THAT THE RATE OF SULFATE BASIN FILLING BY PRECIPITATION AND SEWER RUNOFF WILL REQUIRE START-UP BY BEGINNING OF FEBRUARY 1994 (WWTP SHUT DOWN OPERATIONS ON 11/08/93). WORK PLAN FOR LIMITED DISCHARGE OF SULFATE BASIN #5 TO BE SUBMITTED BY PRP (FMC) AND THEN REVIEWED BY EPA AND VDEQ.

E. REMOVAL COSTS TO DATE (COB 1/28/94):

	ESTIMATED	CEILING
EPA DIRECT COSTS	207,110	310,000
EPA INDIRECT COSTS	359,027	662,500
TAT (E&E) (11/27/93)	1,296,274	1,607,000
ERCS (OHM) (04/07/92)	7,494,499	7,685,000
ERCS (ETI) (10/08/93)	30,984	33,000
USCG (10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS	9,585,409	10,495,015

F. REMEDIAL COSTS TO DATE (COB 1/28/94 UNLESS OTHERWISE NOTED):

	ESTIMATED	CEILING
EPA DIRECT COSTS	111,992	159,520
EPA INDIRECT COSTS	173,912	285,000
TAT (E&E) (11/27/93)	581,172	932,600
TAT (WESTON)	45,958	125,000
ERCS (OHM) (04/28/92)	3,141,564	3,180,000
ERCS (EHRT) (01/22/92)	2,624,582	2,728,840
ERCS (ETI)	784,811	2,850,000
TOTAL REMEDIAL COSTS	7,464,251	10,260,960

AR104444

TOTAL PROJECT COSTS	17,049,660	20,755,975
TOTAL UNALLOCATED COSTS		0
TOTAL PROJECT CEILING		20,755,975

G.	TEN PERCENT STATE SHARE	707,519	TBD
H.	ENFORCEMENT (106) COSTS (2/5/92-8/12/93):		
	EPA	\$ 12,609	
	TAT	\$170,654	

TOTAL ENFORCEMENT COSTS
(AGAINST PROJECT CEILING) \$183,263

I. PERSONNEL ON-SCENE: EPA-2
ERCS(ETI)-16
TAT-2

II. ACTIONS TAKEN

- A. THE ERCS CONTRACTOR CONTINUED STAGING CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE FROM ROOMS AND BUILDINGS OF THE CENTRAL EASTERN SECTOR OF THE FACILITY, AND LABORATORY GRADE CONTAINERS FROM THE NORTHWESTERN AND CENTRAL SECTORS WERE STAGED IN #2 PULP STORAGE.
- B. REMOVAL ACTIVITIES BY ERCS RESUMED WITH THE CONTINUATION OF FIELD CHARACTERIZATION TESTS AND GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS. LAB-PACKING OPERATIONS FOR NORTH R & D LABS COMPLETED AND ACCOMPANYING PACKING LISTS DEVELOPED FOR DISPOSAL.
- C. ERCS CONTINUE DRUM-PUMPING VIA OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES IN PREPARATION FOR TRANSPORTATION AND DISPOSAL. 119 DRUMS OF LOW VISCOSITY ORGANIC LIQUIDS TOTALING 4178 GALLONS BULKED FOR THE WEEK, 134 DRUMS AND 4719 GALLONS TO DATE.
- D. TAT PERFORMED SITE SPECIFIC HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS, CONDUCTED ROOM-BY-ROOM SEARCH FOR OVERLOOKED HAZARDOUS MATERIALS, REVIEWED SAFETY OF OIL-WATER PUMPING SYSTEM AND PROVIDED AIR MONITORING OF SITE ACTIVITY AREAS AS DIRECTED BY EPA.
- E. TAT CONTINUED GENERAL SITE HAZARD IDENTIFICATION AND MONITORED WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS AS TASKED BY EPA.
- F. TAT AND SITE MANAGER OF ARCS PROVIDE SITE TOUR TO TECHNICAL ASSISTANCE GRANT REPRESENTATIVES AND VDEQ ON JANUARY 25 & 26, 1994.
- G. ERM RE-MOBILIZED ONTO SITE TO CONTINUE MONITORING WELL SAMPLING ON ENTIRE SITE.

AR104445

III. FUTURE ACTIONS

- A. REMOVAL ACTIVITIES TO CONTINUE WITH THE INVENTORYING AND STAGING OF CONTAINERS OF HAZARDOUS MATERIALS IN #2 PULP STORAGE. ERCS TO RESTAGE DRUMS IN #2 PULP STORAGE INTO SHIPPING #1, ADJACENT PUMPING OPERATIONS AREA.**
- B. ERCS TO CONTINUE PUMPING OF DRUMS THROUGH OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES FOR LESS EXPENSIVE TRANSPORT AND DISPOSAL.**
- C. ERCS ON-SITE CHEMISTRY LAB TEAM TO CONTINUE WITH THE CONDUCTING OF GENERATING COMPATIBLE COMPOSITE SAMPLES FOR DISPOSAL ANALYSIS AND CONTINUE LAB-PACKING OPERATIONS.**
- D. TAT TO PERFORM SITE SPECIFIC RECONNAISSANCE AND HAZARD IDENTIFICATION IN SECTORS OF FACILITY PRIOR TO ERCS COLLECTION OF CONTAINERS IN THOSE AREAS AND AIR MONITORING IN DRUM PUMPING AREA (OIL-WATER SEPARATION AND FILTRATION SYSTEM).**
- E. TAT TO CONTINUE GENERAL SITE HAZARD IDENTIFICATION AND MONITOR WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.**
- F. ERM TO CONTINUE TO SAMPLE MONITORING WELLS OF ENTIRE S7 AS ARCS MONITOR AND TAKE SPLIT SAMPLES AS WELL.**
- G. ERM WWTP OPERATORS TO FIX BROKEN PIPES AND PUMPS FROM BITTERLY COLD TEMPERATURES AND PROVIDING EPA AND VDEQ WITH PLANS FOR DISCHARGE FROM SULFATE BASIN #5.**

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR104446

POLREP #700

AVTEX FIBERS FRONT ROYAL

404 KENDRICK LANE

FRONT ROYAL, WARREN COUNTY, VA 22630

CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION

ATTN: DEBORAH DIETRICH, GREGG CRYSTAL, AND CHARLES KLEEMAN

CC: BONNIE GROSS (3HW24) AND WAYNE WALTERS (3RC21)

unfiled
1535
2/7/94

I. SITUATION (WEEK ENDING SATURDAY, FEBRUARY 5, 1994)

- A. 24-HOUR SITE SECURITY CONTINUES.
- B. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).
- C. BANKRUPTCY COURT APPOINTED TRUSTEE CONTINUES SITE MAINTENANCE.
- D.
- E. REMOVAL COSTS TO DATE (COB 1/28/94):

	ESTIMATED	CEILING
EPA DIRECT COSTS	207,110	310,000
EPA INDIRECT COSTS	359,027	662,500
TAT (E&E) (11/27/93)	1,296,274	1,607,000
ERCS (OHM) (04/07/92)	7,494,499	7,685,000
ERCS (ETI) (10/08/93)	30,984	33,000
USCG (10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS	9,585,409	10,495,015

F. REMEDIAL COSTS TO DATE (COB 2/4/94 UNLESS OTHERWISE NOTED):

	ESTIMATED	CEILING
EPA DIRECT COSTS	113,784	159,520
EPA INDIRECT COSTS	176,600	285,000
TAT (E&E) (11/27/93)	581,172	932,600
TAT (WESTON)	52,097	125,000
ERCS (OHM) (04/28/92)	3,141,564	3,180,000
ERCS (EHRT) (01/22/92)	2,624,582	2,728,840
ERCS (ETI)	817,523	2,850,000
TOTAL REMEDIAL COSTS	7,507,322	10,260,960
TOTAL PROJECT COSTS	17,092,731	20,755,975
TOTAL UNALLOCATED COSTS		0
TOTAL PROJECT CEILING		20,755,975

- G. TEN PERCENT STATE SHARE 707,519 TBD
- H. ENFORCEMENT (106) COSTS (2/5/92-8/12/93):
 - EPA \$ 12,609
 - TAT \$170,654
- TOTAL ENFORCEMENT COSTS (AGAINST PROJECT CEILING) \$183,263**

- I. PERSONNEL ON-SCENE:
 - EPA-1
 - ERCS(ETI)-11
 - TAT-3

AR104447

II. ACTIONS TAKEN

- A. THE ERCS CONTRACTOR COMPLETED STAGING THE MAJORITY OF NON-BULK HAZARDOUS MATERIALS CONTAINERS IDENTIFIED IN THE BUILDINGS ON-SITE. ERCS CONTINUE STAGING ANY REMAINING NON-BULK CONTAINERS AS IDENTIFIED BY TAT ON A WEEKLY BASIS.
- B. ERCS PERSONNEL BEGAN SEGREGATING SMALL CONTAINERS OF HAZARDOUS MATERIALS STAGED IN PULP STORAGE #2 INTO WASTE STREAMS IN PREPARATION FOR BULKING AND/OR LAB-PACKING OPERATIONS.
- C. ERCS CONTINUE DRUM-PUMPING VIA OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES IN PREPARATION FOR TRANSPORTATION AND DISPOSAL. 168 DRUMS OF HIGH VISCOSITY LIQUIDS TOTALING APPROXIMATELY 7228 GALLONS WERE BULKED FOR THE WEEK. TO DATE, 302 DRUMS (APPROXIMATELY 11,947 GALLONS) HAVE BEEN BULKED TO DATE. COLD TEMPERATURES OVER THE WEEK SLOWED PUMPING OF HIGH VISCOSITY LIQUIDS.
- D. TAT PERFORMED RECONNAISSANCE OPERATIONS IN AREAS OF THE BUILDING WHERE NON-BULK CONTAINERS WERE REMOVED BY THE ERCS CONTRACTOR.
- E. TAT CONTINUED GENERAL SITE HAZARD IDENTIFICATION AND MONITORED WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS AS TASKED BY EPA.
- F. ON FEBRUARY 4, 1994, THE ON-SITE ARCS REPRESENTATIVE ESCORTED REPRESENTATIVES OF SOUTHERN SCRAPS TO IDENTIFY THE LOCATIONS OF FOUR (4) SCALES. SOUTHERN SCRAPS HAS SUBMITTED BIDS ON THESE FOUR SCALES. ALSO ON FEBRUARY 4, THE ON-SITE ARCS REPRESENTATIVE ESCORTED REPRESENTATIVES FROM THE TOWN OF FRONT ROYAL, INDUSTRIAL DEVELOPMENT COMMITTEE, AND INDUSTRIAL REDEVELOPMENT AUTHORITY TO EVALUATE SEVERAL AREAS OF THE PLANT AND DETACHED BUILDINGS FOR REDEVELOPMENT CONSIDERATIONS.
- G. ERM CONTINUED GROUNDWATER MONITORING WELL SAMPLING. SPLIT SAMPLES WERE OBTAINED BY THE REMEDIAL ARCS CONTRACTOR.
- H. THE ERCS CONTRACTOR CONSTRUCTED A PERMANENT DECONTAMINATION AND REST AREA TO BE UTILIZED DURING DRUM PUMPING OPERATIONS.
- I. COLD TEMPERATURES RESULTED IN A PIPE BREAK AT THE DIGESTER PUMP HOUSE (WWTP AREA) ON 2/2/94. THIS BREAK RESULTED IN THE RELEASE OF A SMALL QUANTITY OF A PINK LIQUID, SUSPECTED TO BE A DYE. THIS LIQUID IS CURRENTLY CONTAINED AND IS NOT EXPECTED TO DISCHARGE INTO THE SHENANDOAH RIVER.

III. FUTURE ACTIONS

- A. THE ERCS CONTRACTOR IS TO CONTINUE SEGREGATING NON-BULK CONTAINERS STAGED IN PULP STORAGE #2 INTO WASTE STREAMS IN PREPARATION FOR BULKING AND/OR LAB-PACKING OPERATIONS.
- B. ERCS TO CONTINUE DRUM BULKING OPERATIONS.
- C. WWTP PUMPING AND PERMITTED DISCHARGE OF SULFATE BASIN #5

AR104448

- CONTENTS INTO THE SHENANDOAH RIVER TO BEGIN.
- D. TAT TO CONTINUE RECONNAISSANCE OF AREAS WHERE THE ERCS CONTRACTOR HAS REMOVED NON-BULK CONTAINERS.
 - E. TAT TO CONTINUE TO MONITOR WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.
 - F. ERM TO CONTINUE SAMPLING GROUNDWATER MONITORING WELLS. ARCS CONTRACTOR TO CONTINUE TO OBTAIN SPLIT SAMPLES.
 - G. ERM WWTP OPERATORS TO FIX BROKEN PIPES AND PUMPS DAMAGED FROM BITTERLY COLD TEMPERATURES.
 - H. INDIVIDUALS AND COMPANIES WHICH HAVE PURCHASED ASSETS LOCATED ON-SITE ARE TO BEGIN REMOVING THOSE ASSETS.
 - I. OSC FOX TO BE ON-SITE MONDAY, FEBRUARY 7, 1994 TO ASSIST OSC ENGLISH IN COORDINATION OF REMOVAL ACTIVITIES ON-SITE.

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR104449

E-mailed 2/15/94 1410 / FAXED 2/25/94 1010
to B. Gross

POLREP #701
AVTEX FIBERS FRONT ROYAL
404 KENDRICK LANE
FRONT ROYAL, WARREN COUNTY, VA 22630
CERCLA ENFORCEMENT/REMOVAL/REMEDIAL ACTION
ATTN: DEBORAH DIETRICH, GREGG CRYSTAL, AND CHARLES KLEEMAN
CC: BONNIE GROSS (3HW24) AND WAYNE WALTERS (3RC21)

I. SITUATION (WEEK ENDING SATURDAY, FEBRUARY 12, 1994)

- A. 24-HOUR SITE SECURITY CONTINUES.
- B. ENFORCEMENT ACTIVITIES CONTINUE PER ADMINISTRATIVE ORDER (AO) TO FMC AND AVTEX (TRUSTEE).
- C. BANKRUPTCY COURT APPOINTED TRUSTEE CONTINUES SITE MAINTENANCE.
- D. REMOVAL COSTS TO DATE (COB 1/28/94):

	ESTIMATED	CEILING
EPA DIRECT COSTS	207,110	310,000
EPA INDIRECT COSTS	359,027	662,500
TAT (E&E) (11/27/93)	1,296,274	1,607,000
ERCS (OHM) (04/07/92)	7,494,499	7,685,000
ERCS (ETI) (10/08/93)	30,984	33,000
USCG (10/01/91)	197,515	197,515
TOTAL REMOVAL COSTS	9,585,409	10,495,015

- E. REMEDIAL COSTS TO DATE (COB 2/11/94 UNLESS OTHERWISE NOTED):

	ESTIMATED	CEILING
EPA DIRECT COSTS	116,319	159,520
EPA INDIRECT COSTS	180,952	285,000
TAT (E&E) (11/27/93)	581,172	932,600
TAT (WESTON)	57,482	125,000
ERCS (OHM) (04/28/92)	3,141,564	3,180,000
ERCS (EHRT) (01/22/92)	2,624,582	2,728,840
ERCS (ETI)	847,727	2,850,000

TOTAL REMEDIAL COSTS	7,549,798	10,260,960
TOTAL PROJECT COSTS	17,135,207	20,755,975
TOTAL UNALLOCATED COSTS		0
TOTAL PROJECT CEILING		20,755,975

- F. TEN PERCENT STATE SHARE 707,519 TBD
- G. ENFORCEMENT (106) COSTS (2/5/92-8/12/93):
 - EPA \$ 12,609
 - TAT \$170,654**TOTAL ENFORCEMENT COSTS (AGAINST PROJECT CEILING) \$183,263**

- H. PERSONNEL ON-SCENE:
 - EPA-2
 - ERCS(ETI)-13
 - TAT-2

AR104450

II. ACTIONS TAKEN

- A. THE ERCS CONTRACTOR BEGAN PCB SCREENING OF NON-BULK OIL CONTAINERS STAGED IN PULP STORAGE #2.
- B. ERCS PERSONNEL CONTINUED SEGREGATION OF NON-BULK CONTAINERS STAGED IN PULP STORAGE #2.
- C. ERCS CONTINUE DRUM-PUMPING VIA OIL-WATER SEPARATION AND FILTRATION SYSTEM IN ORDER TO BULK SIMILAR LIQUID SUBSTANCES IN PREPARATION FOR TRANSPORTATION AND DISPOSAL. 224 DRUMS OF HIGH AND MEDIUM VISCOSITY LIQUIDS TOTALING APPROXIMATELY 6,360 GALLONS WERE BULKED FOR THE WEEK. TO DATE, 547 DRUMS (APPROXIMATELY 18,279 GALLONS) HAVE BEEN BULKED TO DATE. COLD TEMPERATURES OVER THE WEEK SLOWED PUMPING OF HIGH VISCOSITY LIQUIDS.
- D. TAT CONTINUED RECONNAISSANCE OPERATIONS IN AREAS OF THE BUILDING WHERE NON-BULK CONTAINERS WERE REMOVED BY THE ERCS CONTRACTOR.
- E. THE EPA APPROVED TWO ADDITIONAL WORK PLANS FOR THE REMOVAL OF ASSETS FROM THE SITE.
- F. THE REMOVAL OF ASSETS FROM THE SITE BY PURCHASERS BEGAN ON 2/9/94 AND CONTINUED ON 2/10/94. ASSETS REMOVED DURING THE WEEK INCLUDED OFFICE EQUIPMENT AND OTHER SMALL ASSETS.
- G. ERM CONTINUED GROUNDWATER MONITORING WELL SAMPLING. SPLIT SAMPLES WERE OBTAINED BY THE REMEDIAL ARCS CONTRACTOR.
- H. THE EPA HAS APPROVED THE REMOVAL OF ASSETS IDENTIFIED IN ZAROLLI & ASSOCIATES LETTER TO EPA DATED 12/7/94.
- I. ON WEDNESDAY, 2/9/94, WWTP PERSONNEL REPORTED TO ARCS ON-SITE REPRESENTATIVE THAT A HEAVY OIL SHEEN WAS NOTED DISCHARGING FROM THE STORM SEWER INTO SULFATE BASIN #1. TAT ERECTED A SERIES OF ABSORBENT BOOM TO CONTAIN THE DISCHARGE AND BEGAN AN INVESTIGATION TO IDENTIFY THE SOURCE OF THE OIL. TAT IDENTIFIED A HEAVY OIL SHEEN IN SEWER MANHOLE #A-12, LOCATED APPROXIMATELY 20 YARDS WEST OF THE BUILDING SOUTH OF THE ENTRANCE TO THE NORTH CORRIDOR. ON 2/11/94, TAT AND ARCS REPRESENTATIVE KOEHLER CONDUCTED A RECONNAISSANCE OF THE SEWER SYSTEM BELOW THE NORTH AND EAST CORRIDORS TO IDENTIFY THE SPECIFIC SOURCE OF OIL. AN OIL CATCH BASIN LOCATED BENEATH THE EAST CORRIDOR AND ADJACENT TO SEWER MANHOLE #A-29 WAS NOTED OVERFLOWING AS A RESULT OF WATER AND OIL RUNOFF FROM THE NORTHEAST CORNER OF THE STAPLE DEPARTMENT. OIL/WATER WAS NOTED ENTERING SEWER MANHOLE #A-29. IT WAS DETERMINED THAT THIS WAS THE MAJOR CONTRIBUTOR OF THE OIL SHEEN IDENTIFIED BY WWTP PERSONNEL ON 2/9/94. NO SIGNIFICANT OIL SHEEN WAS IDENTIFIED IN SEWERS NEAR OIL PUMPING AND BULKING OPERATIONS.
- J. ON FRIDAY, FEBRUARY 11, 1994 ARCS ON-SITE REPRESENTATIVE IDENTIFIED AN AREA OF ROOF COLLAPSE IN THE POWERHOUSE. IT WAS DETERMINED THAT A PORTION OF THE ROOF, WHICH COVERED PCB BEARING TRANSFORMERS ON THE THIRD FLOOR EXTERIOR PLATFORM OF THE POWERHOUSE, HAD COLLAPSED DUE TO EXCESSIVE WEIGHT FROM ICE AND SNOW. OSC FOX WAS INFORMED

AR104451

OF THE SITUATION AND DETERMINED THAT ANY ATTEMPTS TO BRACE THE ROOF WOULD BE TOO DANGEROUS FOR PERSONNEL AT THIS TIME AND SHOULD WAIT UNTIL ICE AND SNOW MELT.

III. FUTURE ACTIONS

- A. THE ERCS CONTRACTOR IS TO CONTINUE SEGREGATING NON-BULK CONTAINERS STAGED IN PULP STORAGE #2 INTO WASTE STREAMS IN PREPARATION FOR BULKING AND/OR LAB-PACKING OPERATIONS. PCB SCREENING OF THESE CONTAINERS IS TO CONTINUE.
- B. ERCS TO CONTINUE DRUM BULKING OPERATIONS.
- C. WWTP PUMPING AND PERMITTED DISCHARGE OF SULFATE BASIN #5 CONTENTS INTO THE SHENANDOAH RIVER TO BEGIN FOLLOWING THAW OF FROZEN LINES.
- D. TAT TO CONTINUE RECONNAISSANCE OF AREAS WHERE THE ERCS CONTRACTOR HAS REMOVED NON-BULK CONTAINERS.
- E. TAT TO CONTINUE TO MONITOR WWTP ACTIVITIES AND SULFATE BASIN FREEBOARD LEVELS.
- F. ERM TO COMPLETE SAMPLING GROUNDWATER MONITORING WELLS. ARCS CONTRACTOR TO CONTINUE TO OBTAIN SPLIT SAMPLES.
- G. ERM WWTP OPERATORS TO FIX BROKEN PIPES AND PUMPS DAMAGED FROM BITTERLY COLD TEMPERATURES.
- H. INDIVIDUALS AND COMPANIES WHICH HAVE PURCHASED ASSETS LOCATED ON-SITE ARE TO CONTINUE REMOVING THOSE ASSETS.
- I. OSC OWENS TO BE ON-SITE THE WEEK ENDING FEBRUARY 20, 1994 TO ASSIST IN COORDINATION OF REMOVAL ACTIVITIES.

GEORGE ENGLISH, OSC
JACK OWENS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

AR104452